



Equal Employment Opportunity Program Status Report for Fiscal Year 2022



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EEOC MD-715 Overview

This Equal Employment Opportunity (EEO) Program Status Report for fiscal year 2022 (FY22) is prepared and submitted in accordance with Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715), EEOC's accompanying *Instructions to Federal Agencies for EEO MD-715*,¹ and related EEOC guidance. Per MD-715, "The overriding objective of this directive is to ensure that all employees and applicants for employment enjoy equality of opportunity in the federal workplace regardless of race, sex², national origin, color, religion, disability, or reprisal for engaging in prior protected activity." Consistent with this objective, MD-715 requires the U.S. General Services Administration (GSA) to:

- Accurately execute the comprehensive assessment checklist in Part G of the report, on at least an annual basis, to evaluate GSA's compliance with various EEO laws, regulations, and other directives, using EEOC's prescribed measures and standards.
- When areas of non-compliance (deficiencies) are identified, MD-715 requires GSA to designate responsible officials who will oversee the development and implementation of relevant corrective plans that show meaningful progress toward resolving the deficiencies (Part H of the report).
- Proactively and systematically identify any institutional, attitudinal, and/or physical barriers that may operate to exclude certain protected groups, and to develop and execute strategic plans to eliminate any identified barriers (Parts I and J of the report).
- Develop and implement a "Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities" (known as the Affirmative Action Plan for Persons with Disabilities (PWD)) (also in Part J of the report).

This EEO Program Status Report (MD-715 report) reflects the results of GSA's efforts throughout FY22. The structure, format, and content of this report are prescribed by the EEOC, including Parts A thru J, data tables A-1 thru B-9, and all supplemental documents (e.g., reasonable accommodations procedures, organizational chart, and EEO policy statement).

¹ See EEOC MD-715 (Oct. 1, 2003) at <https://www.eeoc.gov/federal-sector/management-directive/section-717-title-vii> and Instructions to Federal Agencies for EEO MD-715 at <https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715>. Per EEOC's federal-sector regulations at 29 C.F.R. § Part 1614, MD-715 is binding on all Executive agencies (including GSA). See 29 C.F.R. § 1614.103(b)(2) ("This part applies to . . . Executive agencies as defined in 5 U.S.C. 105"); see also 29 C.F.R. § 1614.102(e) ("Agency programs *shall* comply with this part and the Management Directives and Bulletins that the Commission issues.") (emphasis added).

² EEOC MD-715 and EEOC Instructions on MD-715 use the terms "sex" and "gender" interchangeably.

MD-715 Report Overview

This report is a comprehensive assessment of GSA's regulatory compliance and progress on mandatory activities, including correction of previously identified deficiencies and execution of barrier analyses and affirmative actions to improve participation of persons with disabilities. Reporting requirements, including structure, format, and content are dictated by the EEOC's *Instructions to Federal Agencies* and Federal Sector EEO Portal reporting interface. This report is intended as a snapshot on the status of critical activities to be executed throughout the year.

Of 156 regulatory requirements assessed in Part G of the report, GSA reported 30 deficiencies in FY21. GSA did not resolve these deficiencies in FY22. The deficiencies are associated with:

- Untimely processing of requests for reasonable accommodations and untimely inquiries into harassment allegations;
- Shortfalls in data related to employees, applicants, recruitment activities, and processing of requests for reasonable accommodations and allegations of harassment;
- Non-compliance with EEO regulations that require all supervisors and managers to receive training on anti-harassment, reasonable accommodations, EEO complaints, alternative dispute resolution, supervisory communications, and interpersonal skills;
- Missing EEO-related information (e.g., in GSA's strategic plan, exit survey, and publicly accessible websites); and
- Productive collaboration leading to meaningful barrier analyses, implementation of the Affirmative Action Plan for PWD, and preparation of the annual MD-715 report.

Because GSA identified barriers in FY21, but did not implement associated barrier elimination plans, 1 new deficiency must also be reported in FY22 (in addition to the 30 reported in FY21).

Part H includes 28 corrective plans that identify responsible officials, objectives, and planned activities and deadlines necessary to address each of the 31 identified FY22 deficiencies.

Part E is an executive summary that includes notable analyses and findings. Analyses must be conducted at least annually to identify areas of potential discrimination to be investigated during the upcoming year, as part of ongoing barrier investigations. Part I addresses plans to eliminate barriers related to race, ethnicity, and gender. Part J addresses elimination of barriers affecting PWD. Part J also outlines independent agency Affirmative Action Plan obligations regarding (a) recruitment, (b) hiring, (c) advancement, and (d) retention of PWD.

Part A – Agency Identifying Information

TABLE 1: Agency Identifying Information

Agency identifying information	
1. Agency	U.S. General Services Administration (GSA)
2. Address	1800 F Street, NW
3. City, State, Zip code	Washington, D.C. 20006
4. Agency Code	GS00
5. FIPS Code	11001
6. ANSI Code	DC/11/50000

Part B – Total Employment

FIGURE 1: GSA Total Employment³

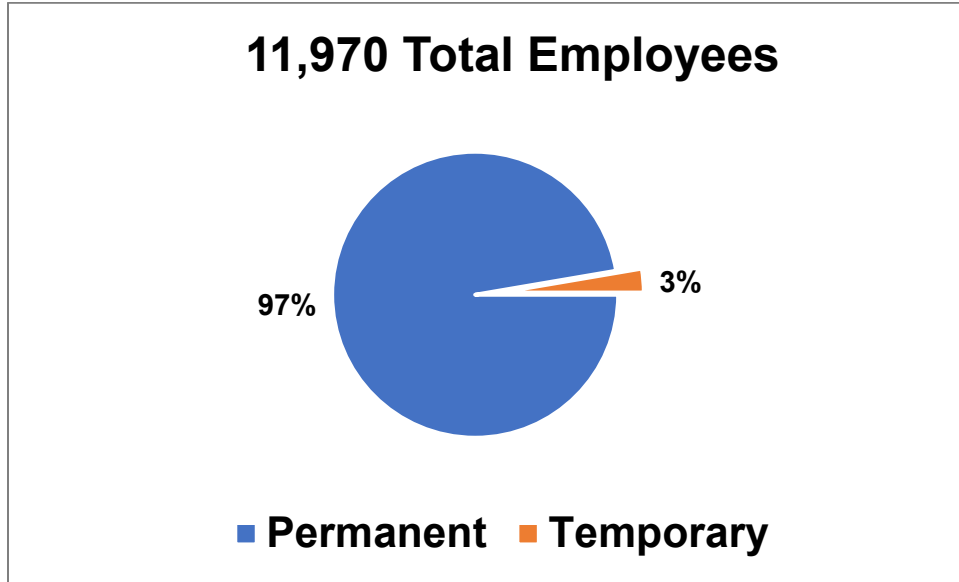
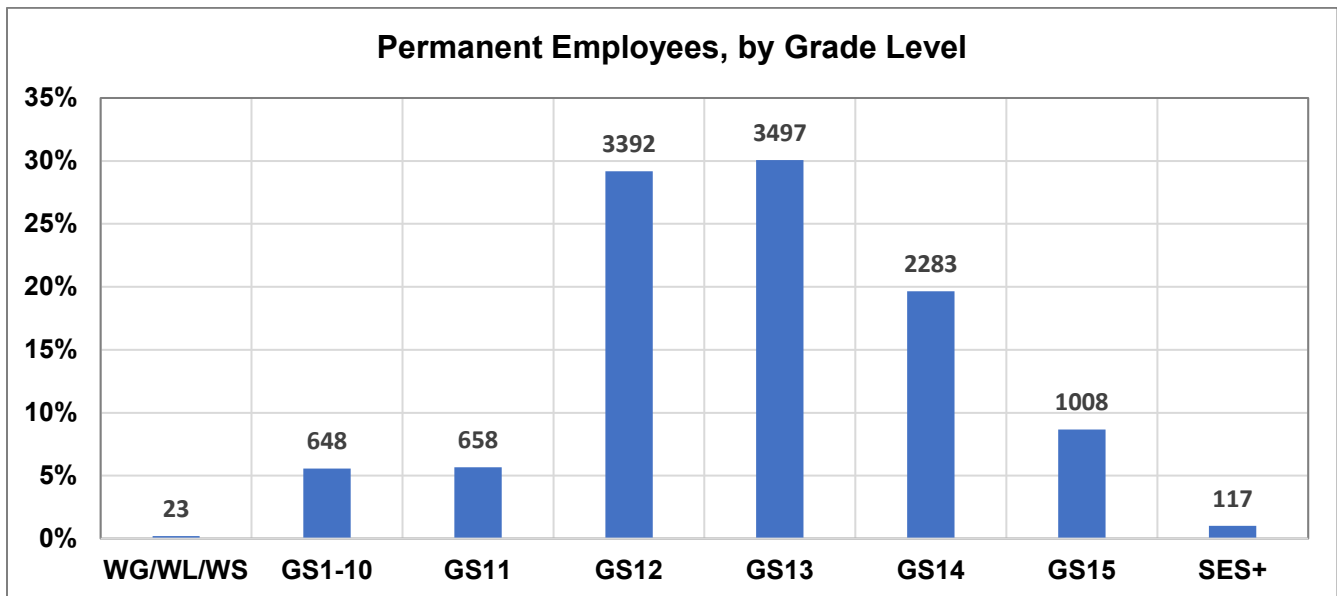


FIGURE 2: Distribution of Permanent Employees, by Grade Level⁴



³ Data as of September 30, 2022.

⁴ In this figure, the SES+ category includes ES, EX, SL, and CA (i.e., all non-GS/WG/WL/WS) positions.

Part C – Officials Responsible for Oversight of EEO-Related Programs

TABLE 2: GSA Responsible Officials

Title Type	Name	Title	Pay Plan, Series, Grade	Phone Number	Email Address
Head of Agency	Robin Carnahan	Administrator	EX-0340-III	202-501-2472	robin.carnahan@gsa.gov
Principal EEO Director/Official	Aluanda Drain	Associate Administrator, OCR	ES-0343-1	202-501-0767	aluanda.drain@gsa.gov
Affirmative Employment Program Manager	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov
Complaint Processing Program Manager	Sylvia Anderson	EEO Manager	GS-0260-14	215-446-4967	sylvia.anderson@gsa.gov
Diversity & Inclusion Officer	Lance Green	D&I Program Manager	GS-0201-14	202-313-7713	lance.green@gsa.gov
Hispanic Employment Co-Program Manager (SEPM)	Edgar Delgado	FEB Program Manager	GS-0301-14	312-502-9424	edgar.delgado@gsa.gov
Hispanic Employment Co-Program Manager (SEPM)	Jeanette Lopez-Torralba	Program Management Specialist	GS-0343-13	312-502-1102	jeanette.lopez-torralba@gsa.gov
Federal Women's Program Manager (SEPM)	Ling Xu	Management and Program Analyst	GS-0343-14	212-264-8307	ling.xu@gsa.gov
Persons with Disabilities (PWD) Co-Program Manager (SEPM)	Hayden Shock	Program Analyst	GS-0343-11	571-365-6927 (text only)	hayden.shock@gsa.gov
Persons with Disabilities (PWD) Co-Program Manager (SEPM)	John Bagwell	Program Specialist	GS-0301-12	404-861-0590	john.bagwell@gsa.gov
Special Placement Coordinator (PWD)	Lance Green	D&I Program Manager	GS-0201-14	202-313-7713	lance.green@gsa.gov
Reasonable Accommodation Program Manager (OHRM)	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.claybrook@gsa.gov
Reasonable Accommodation Program Manager (OIG)	Christopher Edwards	Employee Relations Officer	GS-0201-14	202-273-7387	christopher.edwards@gsaig.gov
Anti-Harassment Program Manager	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.claybrook@gsa.gov
Alternative Dispute Resolution Program Manager	Kellyann Williams	Senior EEO Specialist	GS-0260-14	215-446-4906	kellyann.williams@gsa.gov
Compliance Manager	Jennifer Jusseaume	EEO Manager	GS-0260-14	617-834-5528	jennifer.jusseaume@gsa.gov
Principal MD-715 Preparer	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov

Part D – List of Subordinate Components

GSA is comprised of the Office of the Administrator, which oversees twelve Staff Offices (including the Office of Civil Rights), two Services, two independent Offices, and eleven geographically aligned Regions. GSA organizational components include the following:

Staff Offices:

- Office of Government-wide Policy
- Office of Chief Financial Officer
- Office of GSA Information Technology
- Office of Human Resources Management
- Office of the General Counsel
- Office of Customer Experience
- Office of Strategic Communication
- Office of Small & Disadvantaged Business Utilization
- **Office of Civil Rights**
- Office of Mission Assurance
- Office of Congressional & Intergovernmental Affairs
- Office of Administrative Services

Services:

- Federal Acquisition Service
- Public Buildings Service

Independent Offices:

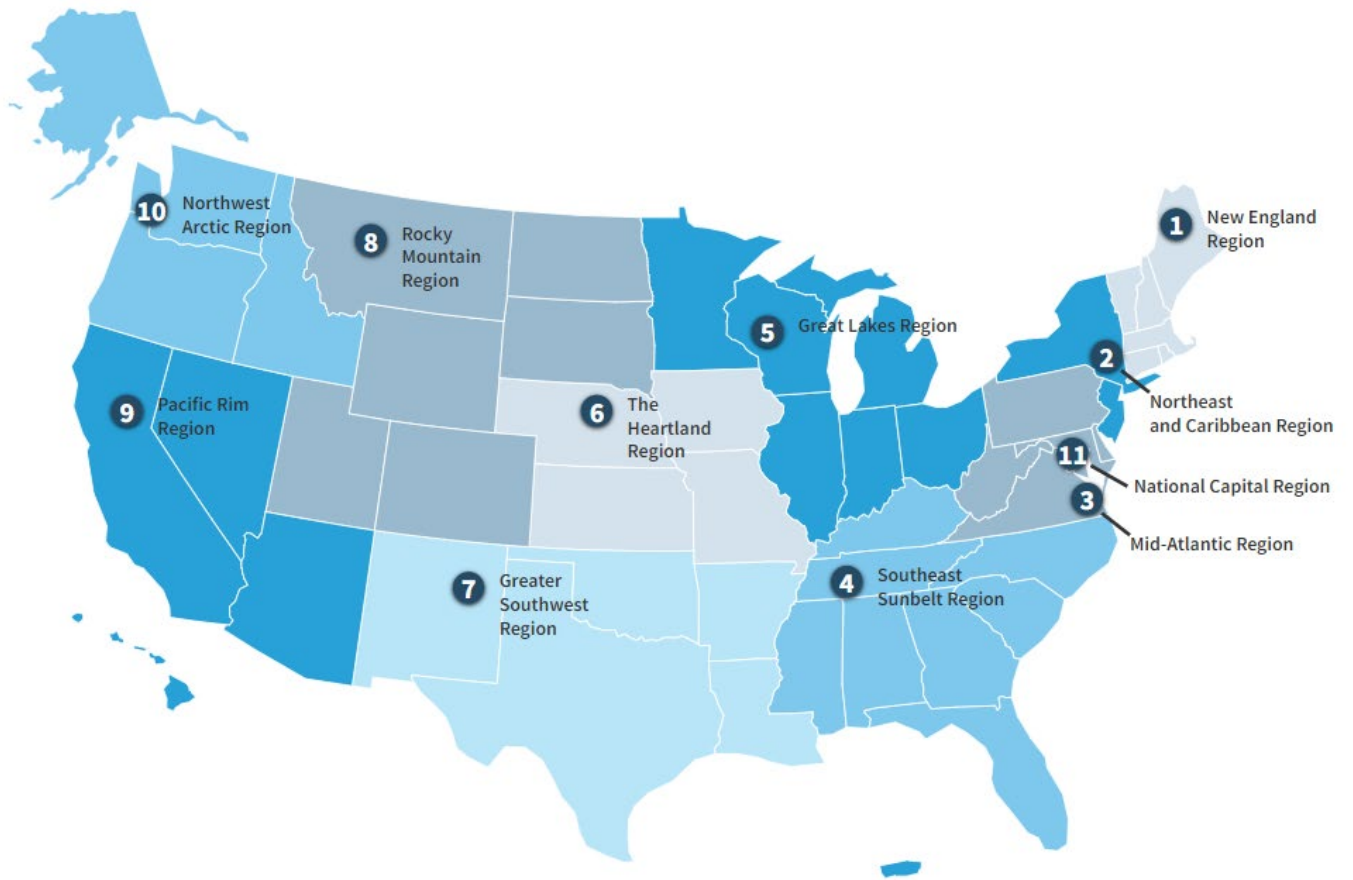
- Office of the Inspector General
- Civilian Board of Contract Appeals

Regions:

- Region 1 – New England
- Region 2 – Northeast & Caribbean
- Region 3 – Mid-Atlantic
- Region 4 – Southeast Sunbelt
- Region 5 – Great Lakes
- Region 6 – Heartland
- Region 7 – Greater Southwest
- Region 8 – Rocky Mountain
- Region 9 – Pacific Rim
- Region 10 – Northwest/Arctic
- Region 11 – National Capital

GSA regions are displayed in Figure 3 on the following page.

FIGURE 3: GSA Regions



Part E – Executive Summary

Per the Equal Employment Opportunity Commission (EEOC) *Instructions to Federal Agencies for EEO MD-715* (hereafter EEOC Instructions), “the purpose of this executive summary is to alert all managers and supervisors of their responsibilities regarding the status of the agency’s EEO program.”⁵ This is to ensure their understanding of both (1) the agency’s overall EEO program direction and (2) the expected contributions necessary for the agency to become a model employer. The content and format of this executive summary are directed by the EEOC. They are intended to provide a quick and informative review of all EEO-related deficiencies that have been identified during the previous fiscal year(s), as well as corrective actions planned to be taken during the current or subsequent fiscal year(s). Additionally, the executive summary discusses barrier analysis efforts undertaken during the past year, as well associated findings and plans to mitigate or eliminate any EEO barriers identified.

In accordance with the EEOC Instructions, this executive summary contains ten mandatory sections (labeled Part E.1 through Part E.10) that provide brief narrative descriptions of:

- The agency’s mission and mission-related functions (Part E.1).
- Weaknesses (e.g., compliance deficiencies) and strengths (e.g., leading practices) of the agency relating to fulfillment of its EEO-related obligations, evaluated against relevant measures and performance standards associated with the EEOC’s “Six Essential Elements of a Model EEO Program” (Parts E.2 – E.7).
- Accomplishments and activities undertaken directly connected to (a) the annual compliance assessment (including efforts to identify and correct program deficiencies) and (b) MD-715 analyses (including trigger⁶ identification, barrier⁷ investigation, and the elimination or mitigation of EEO barriers (when identified)); as well as (c) efforts to correct information or data gaps, if any, that prevent effective analysis and/or assessment (Parts E.8 and E.9).
- Action items and plans to be implemented during the upcoming year (Part E.10).

⁵ See EEOC Instructions, at II.E (Reporting and Line by Line Instructions for Executive Summary).

⁶ Triggers are “red flags” that indicate the possible presence of a discriminatory barrier (see Footnote 7, below). Agencies are required to identify triggers using workforce data, applicant data, career development data, climate survey results, exit surveys, EEO complaints, allegations of harassment, grievances, requests for reasonable accommodations, and other mandatory sources of information.

⁷ A barrier is an agency policy, procedure, practice, or condition that limits or tends to limit employment opportunities for a particular group, based on sex, race, ethnic background, or disability status.

Important Notes about EEO, DEIA, & MD-715 Obligations:

EEO is distinctly separate from the diversity, equity, inclusion, and accessibility (DEIA) program. EEO focuses on preventing and addressing discrimination toward employees, former employees, and applicants for employment, as well as on developing and implementing lawful affirmative actions specifically designed to (a) recruit, (b) hire, (c) advance, and (d) retain persons with disabilities. Aspects of EEO therefore touch on accessibility, and its goal of eliminating discrimination also tends to improve inclusion; however, EEO is not focused on achieving outcomes related to diversity demographics. The EEO program routinely compiles, analyzes, and reports demographic data related to race, ethnicity/national origin, and sex/gender; however, there are no EEO-related diversity goals or associated representation targets related to any of those group characteristics.⁸

Equality and equity are also different. The specific, objective requirements of equal employment opportunity programs are rooted in laws and regulations dating back decades, and have been further refined by EEOC directives, guidance, and instructions, which include explicit standards, measures, and procedures. In contrast, DEIA is a relatively new concept within the federal government. The June 25, 2021 Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce⁹ lays the groundwork; however, standards of success, data-related requirements, implementation strategies, and reporting obligations associated with DEIA are still being refined. Executive Order 14035 requires agency heads to “seek opportunities to establish a position of chief diversity officer or diversity and inclusion officer (*as distinct from an equal employment opportunity officer*), with sufficient seniority to coordinate efforts to promote diversity, equity, inclusion, and accessibility within the agency.” It also requires that the Government-wide DEIA plan “promote a data-driven approach to increase transparency and accountability, *which would build upon, as appropriate, the EEOC’s Management Directive 715 reporting process.*”

It is therefore important that GSA’s EEO-related performance be assessed against the explicit procedures, measures, standards, and reporting criteria directed by MD-715 and the EEOC Instructions, and to specifically not consider efforts spent on DEIA activities to be synonymous with fulfilling the agency’s distinctly separate and exhaustively codified EEO-related obligations.

⁸ 5 U.S.C. § 2302(b) prohibits agencies from discriminating for or against any employee or applicant for employment on the basis of race, national origin, or sex (as well as on the basis of color, religion, age, handicapping condition, marital status, or political affiliation) (emphasis added).

⁹ See <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/25/executive-order-on-diversity-equity-inclusion-and-accessibility-in-the-federal-workforce/>

E.1. Mission of GSA & EEO Program

Purpose and Structure of GSA

The mission of the U.S. General Services Administration (GSA) is to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. GSA's four strategic goals (financially and environmentally sustainable, accessible, and responsive real estate solutions; modern, accessible, and streamlined acquisition services; a digital government delivered through trusted, accessible, and user-centered technologies; and improved government operations through interagency collaboration and shared services) align the agency's mission, set direction, and guide operational planning.

Headquartered in Washington, DC, GSA serves and supports more than 60 Federal departments and agencies through its two main lines of business, the Federal Acquisition Service and the Public Buildings Service, twelve staff offices (including the Office of Civil Rights), eleven regional offices, and two independent offices.

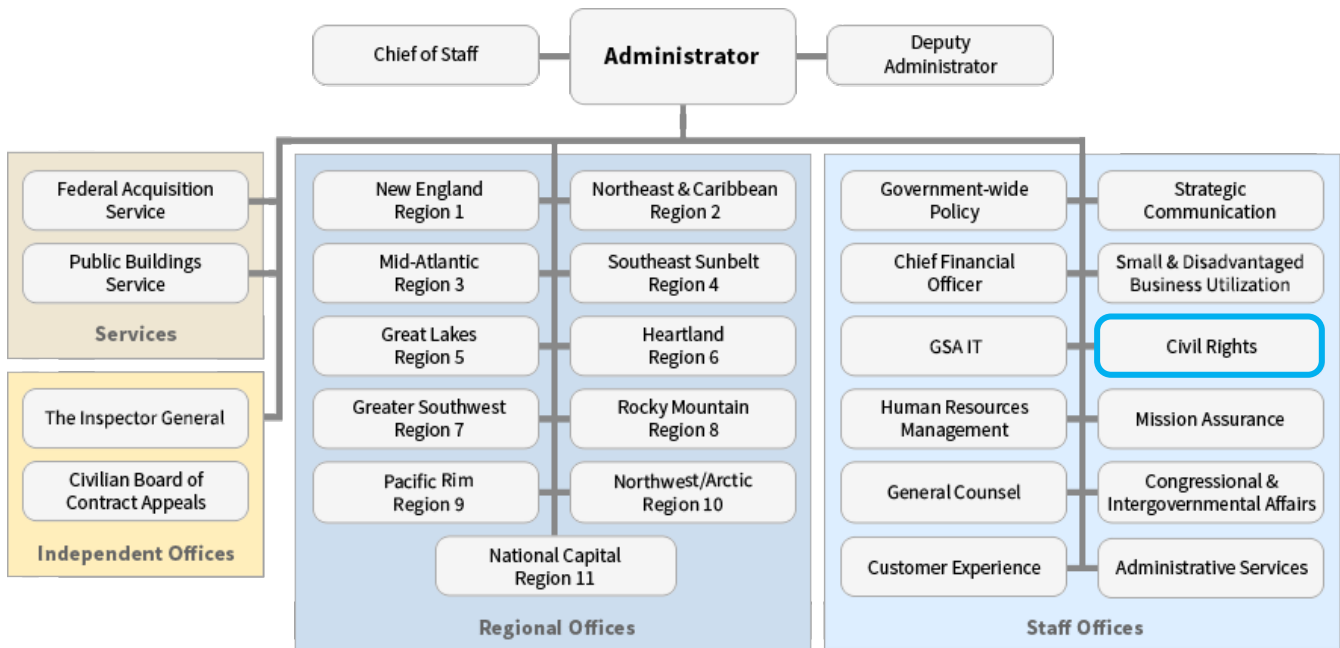
GSA is the nation's largest public real estate organization, providing workspace for over one million federal workers. In FY22, GSA controlled over 8,300 buildings and facilities and maintained more than 360 million square feet of rentable workspace.

GSA is also the premier source for equipment, supplies, telecommunications, and integrated information technology to federal agencies. In FY22, GSA helped agencies procure \$87.5 billion in goods and services, managed over 226,000 fleet vehicles, assisted tens of thousands of federal travelers through GSA's electronic travel system, and served as the focal point for data, information, and services offered by the federal government to its citizens.

The current GSA organizational chart is available on GSA's public website at <https://www.gsa.gov/about-us/gsa-organization>. The GSA's principal EEO official (the Associate Administrator, Office of Civil Rights) reports directly to the agency head (GSA Administrator)¹⁰.

¹⁰ In accordance with 29 C.F.R. § 1614.102(b)(4).

FIGURE 4: GSA Organization Chart



GSA’s EEO Program

GSA’s EEO Program formally resides within the Office of Civil Rights (OCR); however, EEO is in an agency-wide responsibility. EEO obligations extend well beyond OCR, to GSA’s senior leaders, managers, and supervisors, as well as to other Services and Staff Offices (SSOs), including the Office of Human Resources Management (OHRM). Those obligations require all parties to not only engage and collaborate in the execution of key EEO functions spearheaded by OCR, such as development of this MD-715 Report, but also to effectively support EEO through their independent efforts within their respective areas of responsibility.

OCR carries out functions required by the guiding civil rights laws, regulations, and Executive Orders, including Titles VI and VII of the Civil Rights Act of 1964, as amended (Title VI and VII), Sections 501, 504, and 508 of the Rehabilitation Act of 1973, as amended (Rehabilitation Act), and the EEOC’s federal-sector regulations at 29 C.F.R. § Part 1614, as well as EEOC Management Directive 110¹¹ and MD-715.

TABLE 3: Office of Civil Rights Mission, Vision, and Values

Office of Civil Rights Mission:	
To protect civil rights, to champion equal opportunity, and to foster a fair workplace.	
Office of Civil Rights Vision:	
To be a trusted advisor to everyone we serve and to advance equal opportunity for all.	
Office of Civil Rights Values:	
Excellence:	We strive for excellence in everything we do.
Respect:	We treat everyone with dignity and value diversity.
Integrity:	We are fair, trustworthy, and honor our commitments.
Compassion:	We are empathetic and caring to others.
Collaboration:	We go further together, as a team.

¹¹ See EEOC MD-110 (Aug. 5, 2015), at <https://www.eeoc.gov/federal/directives/md110.cfm>.

The Six Essential Elements of Model EEO Programs: GSA Self-Assessment and Action Items

OCR, in partnership with and through other GSA stakeholders, adheres to and promotes the six elements identified by the EEOC in MD-715 as essential for model EEO programs under Title VII¹² and the Rehabilitation Act¹³. The six essential elements¹⁴ are identified by letters A thru F:

- A. Demonstrated commitment from agency leadership
- B. Integration of EEO into the agency's strategic mission
- C. Management and program accountability
- D. Proactive prevention of unlawful discrimination
- E. Efficiency
- F. Responsiveness and legal compliance

To gauge each agency's status in attaining and maintaining a model EEO program¹⁵, the EEOC requires completion of the Part G Self-Assessment Checklist.¹⁶ Containing 156 relevant metrics, the checklist outlines "a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715" and one that "permits EEO Directors to...highlight for their senior staff, deficiencies...that the agency must address to comply with MD-715's requirements."

¹² 42 U.S.C. § 2000e et seq.

¹³ 29 U.S.C. § 791 and the Americans with Disabilities Act Amendments Act of 2008 (Pub. L. 110-325).

¹⁴ See MD-715, at Section II; see also EEOC Instructions, at Section I.

¹⁵ In this context, "EEO program" includes all responsibilities, agency-wide, related to and/or supporting EEO, including not only obligations of OCR's EEO and Affirmative Employment Programs, but also the responsibilities of all agency leaders, managers, supervisors, Services and Staff Offices, and programs.

¹⁶ <https://www.eeoc.gov/federal-sector/management-directive/md-715-part-g-agency-self-assessment-checklist>.

E.2 - Essential Element A: Demonstrated Commitment from Agency Leadership

MD-715 requires agency heads and other senior management officials to demonstrate a firm commitment to equality of opportunity for all employees and applicants for employment.¹⁷

Relevant measures assess the agency head's EEO policy statement, agency communications and recognition mechanisms relating to EEO, and how effectively the agency ensures that EEO principles are instilled into its culture. Per MD-715:

“Agencies must translate equal opportunity into everyday practice and make those principles a fundamental part of agency culture. This commitment to equal opportunity must be embraced by agency leadership and communicated through the ranks from the top down. It is the responsibility of each agency head to take such measures as may be necessary to incorporate the principles of equal employment opportunity into the agency's organizational structure. To this end, agency heads must issue a written policy statement expressing their commitment to equal employment opportunity (EEO) and a workplace free of discriminatory harassment.”¹⁸

During FY22, GSA leadership demonstrated commitment to EEO through several actions associated with the measures under this essential element:

- The GSA Administrator issued a new EEO policy statement on August 19, 2022.
- Beyond mandating formal training for supervisors and managers, GSA requires all employees to regularly receive comprehensive training covering all EEO topics addressed within the Part G self-assessment. At the end of FY22, 99.86% of employees had received that training within 90 days of accession and every two years thereafter.

¹⁷ This MD-715 mandate reinforces statutory requirements. See 42 U.S.C. § 2000e-16(e) (emphasizing the “primary responsibility” of agency heads “to assure nondiscrimination in employment as required by the Constitution and statutes” and his or her “responsibilities under Executive Order 11478 relating to equal employment opportunity in the Federal Government”).

¹⁸ See MD-715, II.A. Essential Elements of Model Agency Title VII and Rehabilitation Act Programs.

- GSA monitors workforce perceptions through participation in the annual Office of Personnel Management (OPM) Federal Employee Viewpoint Survey (FEVS), where GSA's employee response rate in the 2021¹⁹ FEVS was 60% (26% higher than the government average). Overall GSA Employee Engagement Index (EEI)²⁰ scores remain higher than the Government-wide averages, both overall and within each of the three individual EEI subfactors.²¹

The only Part G self-assessment deficiency in this element is that business contact information for GSA's Special Emphasis Program²² Managers (SEPM) is not posted on GSA's *public* website.²³

A.2.b.1

SEPM Contact Info
(PWDP/FWP/HEP) is
Posted on Public Web

Within this executive summary, relevant measures are paraphrased, and also depicted within a graphic on the right side, similar to the one above, along with the associated compliance measure identifier. At the conclusion of section E.7, Figure 5 consolidates and depicts all FY21 deficiencies collectively.

¹⁹ The 2021 FEVS was administered November 1, 2021 through December 31, 2021, and its results were released in FY22. The 2022 FEVS cycle was administered May 21, 2022 through July 15, 2022. FY22 FEVS scores were released in FY23, and will be reported more fully as part of the FY23 MD-715 report.

²⁰ See Office of Personnel Management 2021 FEVS Governmentwide Management Report at: <https://www.opm.gov/fevs/reports/governmentwide-reports/governmentwide-management-report/governmentwide-report/2021/2021-governmentwide-management-report.pdf>.

²¹ EEI subfactors include (a) Leaders Lead, (b) Supervisor, and (c) Intrinsic Work Experience.

²² Mandatory Special Emphasis Programs (SEPs) include the Federal Women's Program (FWP), Hispanic Employment Program (HEP), and Persons with Disabilities Program (PWDP or PWD SEP).

²³ In its full form (as written in the Part G self-assessment checklist), the relevant EEOC measure (A.2.b.1) reads "*Does the agency prominently post the following information throughout the workplace and on its public website: The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)].*"

E.3. Essential Element B: Integration of EEO into Agency's Strategic Mission

EEOC Instructions state that “to ensure that federal agencies achieve their goal of being a model workplace, all managers and employees must view EEO as an integral part of the agency’s strategic mission. The success of the agency’s EEO program ultimately depends on decisions made by individual managers.”²⁴ In accordance with this element²⁵, the agency must:

- Maintain a reporting structure that provides the principal EEO official with regular access to the agency head and other senior management officials for reporting on the effectiveness, efficiency, and legal compliance of the agency’s Title VII and Rehabilitation Act programs.
- Ensure that EEO professionals are involved with, and consulted on, management and personnel actions, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development programs.
- Allocate sufficient funding and qualified staffing to support the success of EEO efforts, not only within OCR, but throughout the agency, including adequate resources to execute:
 - Core EEO functions (including EEO complaints processing, annual compliance assessments, barrier analyses, and EEO training).
 - Critical related programs (including the Anti-Harassment Program, Reasonable Accommodation Program, and mandatory Special Emphasis Programs).
 - Effective data collection and tracking (including systems for managing and analyzing workforce employment lifecycle demographics, applicant flow data, EEO complaints, allegations of harassment, and requests for reasonable accommodation).
- Ensure that all (100%) of agency managers and supervisors receive training on their responsibilities relating to all of the following topics: (a) reasonable accommodations, (b) anti-harassment, (c) EEO complaints, (d) alternative dispute resolution, and (e) effective supervisory/managerial communications and interpersonal skills.
- Ensure that senior managers participate in barrier analysis, implementation of Special Emphasis Programs, and development and implementation of EEO-related action plans.

²⁴ See EEOC Instructions, Section I.II.

²⁵ See MD-715, Model Agency Title VII and Rehabilitation Act Programs, at Section II.B.

Additionally, this element requires that the importance of EEO to the agency’s mission be emphasized, not only by placing the principal EEO official under the immediate supervision of the head of the agency²⁶, but also by clearly depicting that reporting relationship on the agency’s organizational chart and by incorporating EEO principles into the agency’s strategic plan.

GSA supports this element through its compliant reporting structure, integration of EEO into its strategic decision-making, and through resourcing of core EEO functions within OCR (e.g., complaints processing and the Affirmative Employment Program). There are, however, several areas within this element that require improvement in order to become compliant:

- The GSA FY2022-2026 Strategic Plan does not reference EEO principles (a deficiency first reported in FY20). In March 2022, DEIA principles were added to the FY2022-2026 Strategic Plan; however, no EEO principles (e.g., non-discrimination, barrier elimination, affirmative actions for persons with disabilities) were included.
- Several programs and functions that reside outside of OCR were unable to adequately support execution of the EEO program, adversely impacting performance of many fundamental agency obligations related to MD-715, including:
 - Execution of barrier investigations
 - Completion of the annual Part G compliance assessment
 - Implementation of approved prior-year Part H corrective plans
 - Development of complete and accurate workforce and applicant data necessary to generate mandatory MD-715 data tables
 - Sharing of other sources of critical information (e.g., reasonable accommodations and anti-harassment data) required by MD-715
 - Ensuring that all managers and supervisors are compliant with mandatory training requirements (e.g., anti-harassment)

B.3.b

Agency Strategic Plan includes EEO Principles

B.4.a.2

Funding & Qualified Staffing to Conduct *Barrier Analysis*

B.4.a.1

Resources to Conduct Annual *Compliance Assessment*

B.4.a.7

Resources to Maintain Accurate Employee & Applicant Data *Systems*

B.4.a.9

Funding & Qualified Staffing to Effectively Manage *AH Program*

B.4.a.10

Funding & Qualified Staffing to Effectively Manage *RA Program*

B.5.a.1 thru B.5.a.5

Managers/Supervisors Trained on Mandatory EEO-related Topics (5)

²⁶ See MD-110 Chapter 1.III, EEO Director’s Independent Authority and Reporting Relationships.

E.4. Essential Element C: Management and Program Accountability

MD-715 explains that a model Title VII and Rehabilitation Act program will hold managers, supervisors, personnel officers, and EEO officials accountable for effective implementation and management of the agency's EEO-related obligations. Per MD-715, in ensuring such accountability, the agency must:

- Ensure that the EEO and human resources (HR) offices collaborate on (a) conducting barrier analyses, (b) preparing the Annual Agency EEO Program Status (MD-715) Report, (c) executing the Affirmative Action Plan for PWD, (d) conducting outreach and recruiting, and (e) training managers and supervisors.
- Ensure that the HR office timely provides accurate and complete employee, applicant, and other data required to prepare the MD-715 data tables.
- Ensure that the HR office provides timely access to complete and accurate data and information from *other* sources (beyond employee and applicant data), including (a) exit survey data, (b) climate assessment survey results, and data on (c) allegations of harassment, (d) requests for reasonable accommodations, and (e) grievances.
- Ensure effective coordination between the EEO program and relevant HR programs, including the Anti-Harassment Program, Federal Equal Opportunity Recruitment Program²⁷ (FEORP), Disabled Veterans Affirmative Action Program²⁸ (DVAAP), and Selective Placement Program²⁹ (SPP) for persons with disabilities.
- Establish and implement procedures to prevent all forms of discrimination, including harassment and failure to provide reasonable accommodations to qualified PWD.
- Ensure that all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program.

²⁷ <https://www.opm.gov/policy-data-oversight/diversity-equity-inclusion-and-accessibility/reports/#url=Federal-Equal-Opportunity-and-Recruitment-Program>

²⁸ <https://www.chcoc.gov/content/agency-disabled-veterans-affirmative-action-program-dvaap-annual-reporting-15>

²⁹ <https://www.opm.gov/policy-data-oversight/disability-employment/selective-placement-program-coordinator/>

- Ensure that rating officials evaluate the performance the performance of managers and supervisors based on nine EEO-related criteria: (1) resolving EEO conflicts, including participating in alternative dispute resolution; (2) ensuring cooperation of subordinates with EEO officials; (3) maintaining a workplace free from discrimination (including harassment and retaliation); (4) ensuring subordinate supervisors have effective managerial, communication, and interpersonal skills; (5) providing reasonable religious and (6) disability-related accommodations; (7) supporting barrier analysis and (8) anti-harassment efforts, and (9) complying with settlement agreements and orders.

Strengths related to this element:

- One of GSA’s greatest overall strengths in this element is the relevant data and related support provided by OHRM’s Human Capital Analytics Branch, Office of HR Systems, and Talent Development Division. Collectively, those entities annually provide more than 1 million data elements to support MD-715 analysis and reporting obligations.
- GSA’s reasonable accommodations procedures were reviewed by EEOC and found to be compliant on January 7, 2022.

Within this element there are numerous areas that require improvement:

- During FY22, collaboration between the EEO and HR programs was adversely impacted by HR workloads and shifting priorities relating to COVID-19 factors and development and implementation of DEIA initiatives, adversely affecting performance within several MD-715 obligation areas. Specifically, collaboration was insufficient on (1) barrier analysis, (2) preparation of the MD-715 report, (3) implementation of GSA’s Affirmative Action Plan for PWD, and (4) conducting outreach and recruiting (all reportable deficiencies). Additionally, coordination on relevant HR programs, such as the SPP, FEORP, DVAAP, and Anti-Harassment Program was ineffective.
- The GSA Anti-Harassment Program did not provide complete data to support the assessment of timeliness of harassment inquiries (a reportable Part G deficiency), preventing completion of the annual assessment and report (independent deficiencies), and relevant analyses of triggers and barriers (separate additional deficiencies).

C.4.e.4

HR/EEO Collaborate on Barrier Analysis and Elimination

C.4.e.5

HR/EEO Collaborate on Preparing Annual MD-715 Report

C.4.e.1

HR/EEO Collaborate to Implement Affirmative Action Plan for PWD

C.4.e.2

HR/EEO Collaborate on PWD Outreach & Recruiting

C.2.a.5

Timely Processing of Harassment Allegations

- The GSA Reasonable Accommodations Program did not provide timely, complete, and accurate data to support completion of the annual MD-715 compliance assessment (a reportable deficiency). The data was sufficient to confirm that reasonable accommodations were untimely processed in FY22; however, data was not sufficiently accurate to calculate and report the extent of the untimeliness (a separate deficiency).

C.2.b.5

Timely Processing of Reasonable Accommodations

- Comprehensive MD-715 data requirements are provided in the EEOC Instructions.³⁰ While OHRM's data related to employees, applicants, and career development is generally accurate and complete, this data has key technical deficiencies that are reportable under Part G and/or Part J³¹ of the MD-715 report. Collectively, those data-related issues prevent the development of accurate MD-715 data tables (a reportable deficiency) and negatively impact both trigger identification and barrier analysis (each a reportable deficiency in essential element D (proactive prevention of discrimination)). Additionally, those issues also directly impact GSA's ability to meet its goals related to PWD and persons with targeted disabilities (PWTD)³² (deficiencies that are reported in Part J).

C.4.c

HR Timely Provides Complete & Accurate Data for MD-715 Tables

C.4.d

HR Provides *Other Data* for MD-715 Analysis/Reporting

- Examples of issues with employee data:
 - GSA employee data has internal conflicts between critical data elements inside the system of record, such as employee appointment authority codes that take disability into account, veterans' preference codes denoting status as a disabled veteran, and disability status codes. That data also conflicts with external data associated with requests for disability-related reasonable accommodations.³³

³⁰ See EEOC Instructions, Section IV – Interpretation and Completion of Workforce Data Tables.

³¹ Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of PWD.

³² Targeted disabilities include 12 specific disabilities identified on OPM Standard Form 256 (SF-256) that are independently tracked by EEOC and OPM because of historical issues related to under-employment and discrimination. Targeted disabilities are a subset of all disabilities (as PWTD are a subset of PWD). Examples include developmental disabilities, intellectual disabilities, traumatic brain injury, deafness, blindness, psychiatric disorders, missing extremities, seizure disorders, paralysis, significant mobility impairments, dwarfism, and significant disfigurements.

³³ 29 C.F.R. § 1614.203(d)(6)(ii) permits agencies to classify an employee as PWD based on (a) self-identification, (b) hiring authorities that take disability into account (such as Schedule A(u) and authorities for disabled veterans), and (c) requests for reasonable accommodations.

- GSA is unable to differentiate between data that is self-identified by employees and data that is artificially generated by the agency (such as when an employee leaves a self-identification form blank). This adversely impacts the effectiveness of assessments and analyses related to race, ethnicity, sex, and disability status.
- The Schedule A(u) hiring authority for individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities³⁴ *requires* employees, once appointed under that authority, to (a) furnish an accurate disability code or, if they do not, (b) agencies should determine the appropriate code using the employee's records or medical documentation³⁵ (resulting in an accurate code, whether self-identified or designated by the agency). Some GSA employees appointed under Schedule A(u) have inaccurate disability status codes within the employee data system (including some who have codes that indicate they have *no* disabilities).
- Agencies are required to annually report statistics related to the conversion of eligible Schedule A(u) hires to the competitive service (and must also identify any reasons for not converting eligible employees after the conclusion of their respective 2-year probationary periods). That information was not available in FY20, FY21, or FY22 (a reportable Part J deficiency). At the end of FY22, GSA had 231 Schedule A(u) appointees. Forty-four of these appointees were 2 or more months beyond their respective 2-year probationary periods but had not been converted to the competitive service. An additional 49 Schedule A(u) employees will reach the ends of their respective 2-year probationary periods by the end of FY23.
- Issues with applicant flow data:
 - EEOC Instructions require applicant flow data to include accurate statistics on five independent milestones within the selection process, including data on: (1) *applications*, (2) *qualified* applicants, (3) *referred* applicants, (4) *interviewed* applicants, and (5) *selected* applicants. GSA does not consistently collect data on interviews. Interview data was collected for fewer than 1% of FY22 announcements, preventing effective trigger identification and barrier analysis of the highest-priority triggers. The lack of interview statistics was also documented as a deficiency by the EEOC during their FY20 Technical Assistance Review and

³⁴ See 5 CFR § 213.3102(u) at <https://www.ecfr.gov/current/title-5/chapter-I/subchapter-B/part-213>.

³⁵ See Privacy Act Statement, OPM Standard Form 256 (SF-256) Self-Identification of Disability.

in their feedback on the data contained in the GSA's FY20 MD-715 report.

- A significant challenge to meaningful barrier analysis of applicants is the exceptionally low rate of self-identification of disability status during the application process. During FY22, only 8% of new hire applicants and 6% of applicants for internal competitive promotions voluntarily disclosed disability status information.
- Although not required to develop the MD-715 data tables, another challenge to the barrier analysis process is a lack of comprehensive applicant flow data for appointments made using direct hire authorities. Notably, the single most-used appointment source among all current GSA employees is a direct hire authority³⁶.
- Issues with career development data:
 - Part J of the annual MD-715 report requires agencies to identify and report statistics on PWD and PWTD participation in career development opportunities that require competition and/or supervisory recommendations or approvals. Specifically, Part J requires agencies to identify participation statistics for PWD, PWTD, and overall agency participation in seven separate categories of career development programs³⁷, including: (1) internship programs, (2) fellowship programs, (3) mentoring programs, (4) coaching programs, (5) detail programs, (6) training programs, and (7) other career development programs. While GSA manages and provides relevant data on a variety of Competitive Development Programs (CDPs), during FY22, it did not manage, compile, or provide agency-wide statistics on participation in details, internships, or mentoring opportunities; however, progress was made on efforts to capture and compile relevant career development statistics in those areas, and plans were made to begin capturing mentoring data from certain subcomponents and/or programs in FY23.

³⁶ Appointment Authority Code AYM accounts for 16% of all current GSA employees.

³⁷ See EEOC Instructions, Section III.II, Part J Section IV.B(2): Career Development Opportunities.

E.5. Essential Element D: Proactive Prevention of Discrimination

According to MD-715:

“Agencies have an ongoing obligation to *prevent* discrimination on the bases of race, color, national origin, religion, sex, age, reprisal, and disability, and to eliminate barriers that impede free and open competition in the workplace. As part of this on-going obligation, agencies must conduct a self-assessment on at least an annual basis to monitor progress, identify areas where barriers may operate to exclude certain groups, and develop strategic plans to eliminate identified barriers.”³⁸

In addition, MD-715 also states that:

“Each agency must develop and maintain an affirmative action program plan for the hiring, placement, and advancement of individuals with disabilities”³⁹ and that agencies have a “responsibility to provide employment opportunities for qualified applicants and employees with disabilities, especially those with targeted disabilities.”⁴⁰

To those ends, this element requires that:

- Agencies regularly (at least annually) identify potential signs of discrimination (triggers) using both (1) mandatory MD-715 data tables and (2) specific *other sources of information*, including, but not limited to: (a) data on reasonable accommodations; (b) data pertaining to the anti-harassment program; and (c) data from exit surveys (which must include questions on how the agency can improve recruitment, hiring, inclusion, advancement, and retention of PWD⁴¹).
- Agencies conduct systematic root cause analyses to identify potential barriers, specifically by using relevant other sources of information (beyond workforce/applicant data).
- When barriers are identified, agencies must develop and implement plans to eliminate them.
- Agencies produce and implement an Affirmative Action Plan for PWD (Part J of the MD-715 report).

³⁸ See MD-715, Section II.D.; see also EEOC Instructions, at Section I.IV (Element D).

³⁹ Ibid, Part B.I.

⁴⁰ Ibid, Part B.III.

⁴¹ See EEOC Instructions, at Section I.IV..B.5 and Section III (Part J Section V.A.4)

GSA has two notable strengths in this element:

- The process for using employee and applicant data *to identify triggers* is both highly refined and automated, making that process both very effective and efficient, speeding the initial step of the barrier investigation process and enabling consistent analyses from year to year.
- GSA developed an Alternative Benchmark Tool in FY20 to generate relevant organization-specific benchmarks using Census data and EEOC crosswalks. In FY22, GSA not only updated the Tool to use 2014-2018 Census American Community Service (ACS) data (in lieu of using older 2010 decennial Census data), but also revised the 2014-2018 ACS data to align with EEOC data aggregation rules for Two or More Races, significantly improving the accuracy of benchmarks for Black or African American, Asian, American Indian or Alaska Native, and Two or More Races demographic groups. The revised Tool and alignment methodology were then shared with the EEOC and other federal agencies.

In addition to those strengths, GSA also has several deficiencies within this essential element:

- Data from relevant “other sources” (e.g., reasonable accommodations data, anti-harassment data, grievance data, exit survey data, or Schedule A(u) data) was not timely provided in FY22, and the data that was provided was not accurate and complete, preventing mandatory trigger identification and barrier analysis efforts (separate reportable deficiencies). Shortfalls with exit survey data, anti-harassment program data, and reasonable accommodations data are all independently reportable deficiencies addressed by compliance measures under other essential elements.
- GSA’s exit survey language lacks questions required by MD-715⁴² on “how the agency can improve the recruitment, hiring, inclusion, and advancement of individuals with disabilities.” That deficiency was previously identified in GSA’s FY20 and FY21 MD-715 reports.
- GSA did not implement its plans to eliminate the two barriers reported in FY21, and did not meet the target dates of associated planned barrier elimination activities.

D.1.b

Trigger Identification
Regularly includes
Other Data Sources

D.2.d

Barrier Investigations
Regularly include
Other Data

D.1.c

Exit Surveys are
Conducted & Include
Questions on PWD

D.3.b

Reported Barrier
Elimination Plans
are Implemented

⁴² See EEOC Instructions, Section I.IV.A(3) and 29 C.F.R. § 1614.102(e) and 203(d)(1)(iii)(C)

- One of the most significant GSA deficiencies is that GSA did not execute the Affirmative Action Plan (AAP) for PWD, an issue that was also identified in FY21 as a barrier. Major improvements are required in each of the four critical aspects of the AAP for PWD, including (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD and PWTD⁴³. Shortfalls in the AAP for PWD account for only two deficiencies within this element; however, they are associated with deficiencies in other elements of model programs and in Part J, as well as with shortcomings in several related HR programs and activities that affect PWD and PWTD recruitment, hiring, advancement, and/or retention, including:
 - Reasonable Accommodation Program
 - Disabled Veterans Affirmative Action Program
 - Selective Placement Program
 - Utilization of the Schedule A(u) hiring authority
 - Management and conversion of employees appointed under Schedule A(u)
 - Management of disability status codes for individuals hired under Schedule A(u)
 - Management of disability status codes for disabled veterans hired under the Veterans' Recruitment Appointment authority (VRA), Veterans Employment Opportunity Act (VEOA) authority, or the 30% or More Disabled Veteran hiring authority
 - Management of disability status codes for disabled veterans with OPM veterans' preference codes associated with service-connected disabilities⁴⁴

⁴³ 29 C.F.R. § 1614.203(d)(7)(ii) and MD-715 Part G require agencies "to take specific steps reasonably designed to gradually increase the number of persons with disabilities or targeted disabilities employed at the agency."

⁴⁴ See <https://www.opm.gov/policy-data-oversight/veterans-services/vet-guide-for-hr-professionals/> and <https://dw.opm.gov/datastandards/referenceData/1587/current?index=V>. Veterans' preference codes 4 and 6 *always* indicate status as a disabled veteran. Veterans' preference code 3 *may* indicate status as a disabled veteran.

- Because GSA did not effectively implement the AAP for PWD (as well as with the other programs and issues identified above), the agency is deficient in meeting its obligation to:

- Take *specific steps* to ensure that qualified PWD are aware of and encouraged to apply to job vacancies.⁴⁵

D.4.b

Agency takes *Specific Steps* to Recruit Qualified PWD

- Take *specific steps* that are reasonably designed to increase the number of PWD and/or PWTD employed at the agency until it meets its established participation goals.⁴⁶

D.4.d

Agency takes *Specific Steps* to Meet % Goals for PWD & PWTD

⁴⁵ See 29 C.F.R. § 1614.203(d)(1).

⁴⁶ 29 C.F.R. § 1614.203(d)(7) requires agencies to commit to ensuring PWD and PWTD participation (both between GS1-GS10 and between GS11-SES) is at least 12% and 2%, respectively. In August, 2022, GSA approved higher agency-specific participation goals of 18% and 3% for PWD and PWTD, respectively.

E.6. Essential Element E: Efficiency

MD-715 “requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process.”⁴⁷ To that end, this element requires that agencies:

- Have an efficient, fair, and impartial complaint resolution process.
- Have a neutral EEO process, separate from the agency’s defensive function and other agency functions with conflicting or competing interests.
- Establish and encourage widespread use of alternative dispute resolution (ADR) to facilitate early, effective, and efficient informal resolution of disputes.
- Maintain systems to accurately collect, monitor, and analyze all the following types of data:
 - Employee race, national origin, sex, and disability status demographics
 - Applicant flow data concerning race, national origin, sex, and disability status
 - Processing of requests for disability-related reasonable accommodations
 - Processing of allegations of harassment
 - Recruitment activities
 - EEO complaint activity

In FY22, GSA was timely in all EEO complaints processing, including all counseling, investigations, and final agency decisions. FY22 was also the fourth consecutive year of reduced complaint-related activity, which decreased 17% from FY21 (and 44% since FY18).

One strength in this element is the presence of a dedicated Attorney Advisor (GS-0905) within OCR’s Adjudication and Compliance Team to ensure the neutrality of the EEO process.

Most deficiencies in this element are associated with the GSA's agency's inability to maintain effective data collection and management systems necessary to evaluate EEO-related

⁴⁷ See MD-715, Model Agency Title VII and Rehabilitation Act Programs, at Section II.E and EEOC Instructions, at Section I.V.

programs. Specifically, there are numerous previously identified deficiencies associated with GSA’s systems for (1) employee data, (2) applicant flow data, (3) anti-harassment data, (4) reasonable accommodations data, and (5) recruitment data.

Note: The Part G checklist comprehensively assesses compliance by evaluating separate aspects of key requirements using different measures within different essential elements, each focused on a particular EEO obligation. With respect to data, element C assesses *required outcomes* (i.e., timely, accurate, and complete data), while essential element B assesses the *adequacy of funding and qualified staffing resources* to achieve those outcomes and element E measures the *adequacy of systems to accurately collect, monitor, and analyze data* (in this context, “systems” include hardware, software, and associated data management procedures). Deficient outcomes associated with each of the five data areas identified above may be a result of a combination of shortfalls in (a) staffing resources, (b) training, (c) systems/software, and/or (d) data management. As a result, essential elements B, C, and E each include unique but interrelated deficiencies relating to data. Figure 5 (on page 35, at the end of this section) consolidates and depicts all 30 Part G deficiencies identified during FY21, as well as the one new deficiency identified in FY22, and the key interrelationships between all of the deficiencies.

Within this essential element, examples of identified deficiencies include:

- GSA’s employee data system does not effectively integrate disability status information from applicable sources, nor can it identify the source of each element of demographic data (i.e., whether an employee’s race/ethnicity data or disability status data was self-identified or designated by the agency).⁴⁸
- When employees do not self-identify race or ethnicity or are thought to have provided inaccurate information, the Agency does not always adhere to regulations that would ensure accurate demographic information.⁴⁹

E.4.a.2

System to Accurately
Collect, Monitor, &
Analyze *Employee*
Data

⁴⁸ See EEOC Instructions, Section IV.I.E and 29 C.F.R. § 1614.203(d)(6)(ii).

⁴⁹ In cases when race or ethnicity is not self-identified, 29 C.F.R. § 1614.601(b) states that “the agency must make visual identification and inform the employee of the data it will be reporting” and when self-identified race or ethnicity information is believed to be inaccurate, it states that “the agency shall advise the employee about the solely statistical purpose for which the data is being collected, the need for accuracy, the agency’s recognition of the sensitivity of the information and the existence of procedures to prevent its unauthorized disclosure,” in order to encourage accurate self-reporting.

- Not all Schedule A(u) hires have their disability status information accurately reflected in the employee data system of record as mandated by OPM.
- GSA’s applicant flow data procedures do not ensure the capture of mandatory data (e.g., accurate and complete statistics on which referred applicants were subsequently interviewed, and data relating to direct hires and appointments of senior executives).
- Data on recruitment activities is not managed within a system that permits accurate collection, monitoring, or analysis.
- Data on allegations of harassment is incomplete, preventing effective barrier analysis, trigger identification, and tracking of Part H corrective plans, as well as execution of Part G assessment and reporting requirements.
- Reasonable accommodations data is inaccurate and incomplete, preventing effective barrier analysis, accurate Part G assessment and reporting, as well as tracking of Part H corrective plans to address untimely processing of reasonable accommodations requests (a FY20, FY21, and FY22 deficiency, as well as a FY21 and FY22 barrier).
- It is impossible to link the harassment data and reasonable accommodation data provided with employee data and EEO complaint data due to the absence of specific data elements required for barrier analysis.

E.4.a.4
System to Accurately Collect, Monitor, & Analyze Applicant Data

E.4.a.3
System to Accurately Collect, Monitor, & Analyze Recruiting

E.4.a.6
Systems to Accurately Collect, Monitor, & Analyze AH Data

E.4.a.5
Systems to Accurately Collect, Monitor, & Analyze RA Data

E.7 Essential Element F: Responsiveness and Legal Compliance

According to EEOC Instructions, agencies must:

- Have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.
- Comply with the law, including EEOC regulations, management directives, orders, and other written instructions.
- Report program efforts and accomplishments to EEOC.

GSA is fully compliant with all measures within this essential element.

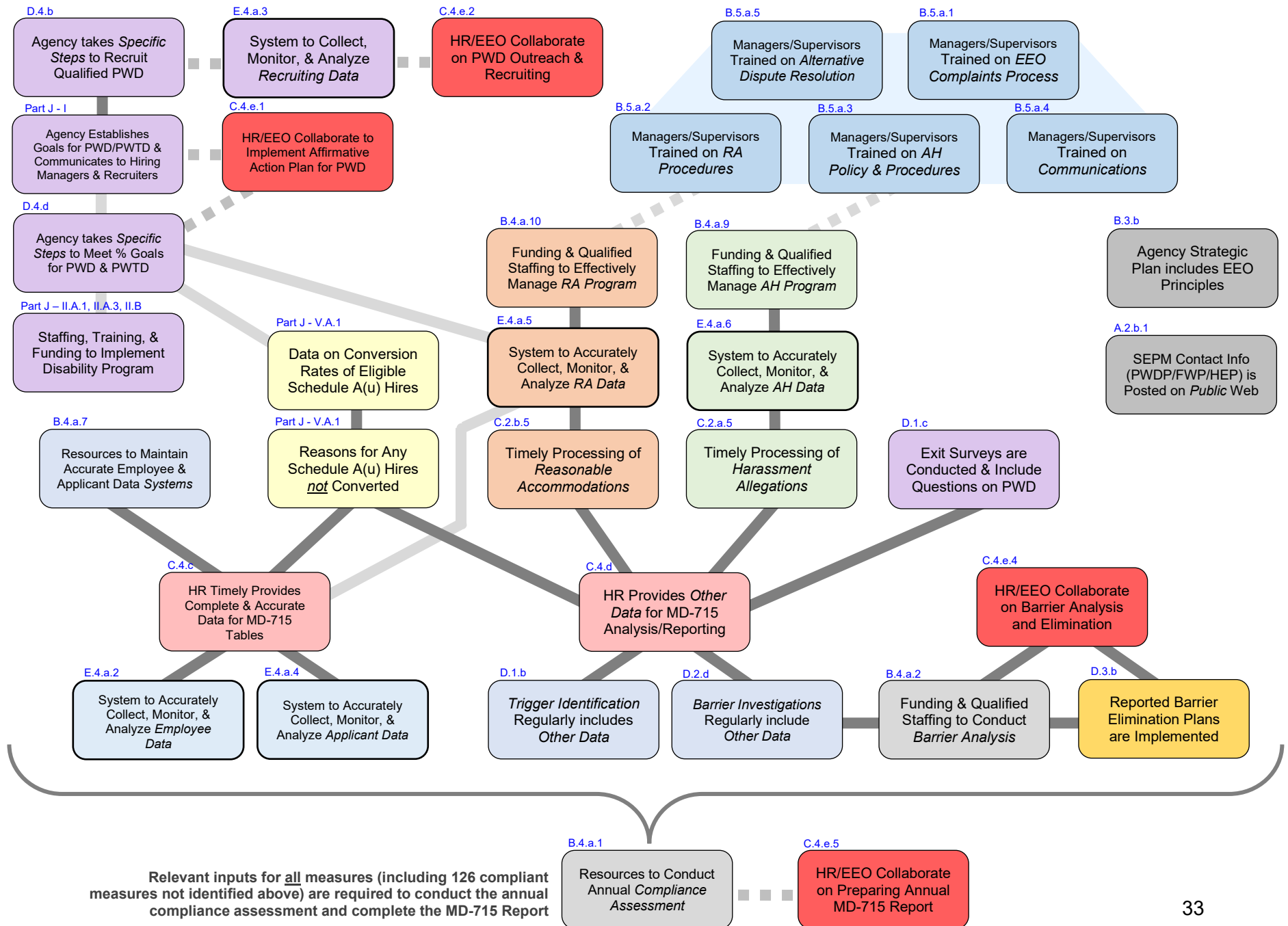
To provide a more comprehensive understanding of all of the compliance deficiencies that are being reported in FY22, Table 3 and Figure 5 are provided on the following pages. Table 3 consolidates and summarizes the 30 Part G deficiencies identified in FY21 and the 1 additional FY22 Part G deficiency, along with their respective Part G measures and essential elements. Figure 5 shows the major interrelationships between the identified deficiencies, as well as 4 relevant shortfalls identified within Part J of the report (the Special Program Plan for Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities, also known as the AAP for PWD). The complete Part G Self-Assessment Checklist begins on page 65.

TABLE 4: Part G Self-Assessment Measures Identified as Deficient

Measure					Questions	Part H	
1	A	2	b	1	Does the agency prominently post the business contact information for its Special Emphasis Program Managers throughout the workplace and on its public website?	H.1	
2	B	3	b		Does the agency's current strategic plan reference EEO / diversity and inclusion principles? If "yes", identify the EEO principles in the strategic plan in the comments column.	H.3	
					Has the agency allocated sufficient funding and qualified staffing to:		
3	B	4	a	1	Conduct a self-assessment of the agency for possible program deficiencies?	H.4	
4	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.5	
5	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.6	
6	B	4	a	9	Effectively manage its anti-harassment program?	H.7	
7	B	4	a	10	Effectively manage its reasonable accommodation program?	H.8	
					Have all managers and supervisors received training on their responsibilities regarding:		
8	B	5	a	1	The EEO Complaint Process?	H.9	
9	B	5	a	2	Reasonable Accommodation Procedures?	H.9	
10	B	5	a	3	Anti-Harassment Policy?	H.9	
11	B	5	a	4	Supervisory, managerial, communication, and interpersonal skills in order to supervise effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	H.9	
12	B	5	a	5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	H.9	
13	C	2	a	5	Are inquiries begun of all harassment allegations within 10 days of notification, including those initially raised in the EEO complaint process? What is the percentage of timely-processed inquiries?	H.10	
14	C	2	b	5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? What is the percentage of timely-processed requests?	H.11	
15	C	4	c		Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?	H.12	
16	C	4	d		Does the HR office timely provide the EEO office access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request?	H.13	
					Does the EEO office collaborate with the HR office to:		
17	C	4	e	1	Implement the Affirmative Action Plan for PWD?	H.14	
18	C	4	e	2	Develop and/or conduct outreach and recruiting initiatives?	H.15	
19	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.16	
20	C	4	e	5	Assist in preparing the MD-715 report?	H.17	
21	D	1	b		Does the agency regularly use the following sources of information for trigger identification : Workforce data, complaint/grievance data, exit surveys, focus groups, affinity groups, special emphasis programs, reasonable accommodation program, anti-harassment program, and external special interest groups?	H.18	
22	D	1	c		Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities?	H.19	
23	D	2	d		Does the agency regularly review the following sources of information to find barriers : Complaint/grievance data, exit surveys, focus groups, affinity groups, anti-harassment program, special emphasis programs, reasonable accommodation program, and external special interest groups?	H.20	
24	D	3	b		If the agency identified barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities?	H.28	
25	D	4	b		Does the agency take specific steps to ensure qualified PWD are encouraged to apply for vacancies?	H.21	
	D	4	d		Has the agency taken specific steps that are reasonably designed to increase the number of Persons with Disabilities or targeted disabilities employed at the agency until it meets the goals?	H.22	
26						Does the agency have systems in place to accurately collect, monitor, and analyze:	
27	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.23	
28	E	4	a	3	Recruiting activities?	H.24	
29	E	4	a	4	External and internal applicant flow data concerning applicants' race, national origin, sex, and disability status?	H.25	
30	E	4	a	5	The processing of requests for reasonable accommodation?	H.26	
31	E	4	a	6	The processing of complaints for the anti-harassment program?	H.27	

FIGURE 5: Deficient Measures & Interrelationships

Part G Deficiencies & Part J Compliance Measures
and key interrelationships



E.8 Workforce Analysis

The GSA workforce is comprised primarily of permanent employees (97%) and General Schedule (GS and GM) employees (98.8%), the majority of which (77%) fall between grade levels GS-12 to GS-14. Fewer than 6% of employees are in grade levels GS-10 and below. A total of 117 employees (1%) are in senior pay plans (i.e., ES, EX, SL, and CA) and 23 employees (0.2%) are in Federal Wage System positions (WG, WL, and WS).

Preliminary workforce analyses (trigger identification) utilized employee and applicant data from the mandatory MD-715 tables to assess opportunity throughout the employment lifecycle by comparing the participation rates of specified demographic groups against relevant EEOC benchmarks. Differences between participation rates and relevant benchmarks were used to identify “triggers” (indicators of potential discriminatory barriers affecting a particular group). FY22 benchmarking used both external and internal baselines, as specified by the EEOC. External benchmarks included Census data (e.g., National Civilian Labor Force (NCLF), occupation-specific CLFs (OCLFs), and/or regional CLFs), as well as specified federal goals for PWD and PWTD. Internal benchmarks included demographics from relevant workforce feeder pools associated with key employment lifecycle events (e.g., promotions, awards, separations).

To simplify analyses, GSA depicts all comparative results as percentages, *relative to their respective relevant benchmarks*, so that a value of 100% is “expected” (i.e., actual demographic rates equal their respective benchmarks). Using this methodology, trigger percentages below 100% signify that actual participation rates were lower than expected, while trigger percentages above 100% indicate that actual participation rates were higher than expected. In almost all cases, the analyses assess participation of groups in *desirable* employment opportunities (such as referrals, selections, promotions, hires, awards, etc.). Therefore, in most cases, lower than expected participation rates (i.e., trigger rates below 100%) are unfavorable, and therefore, triggers. When analyzing adverse employment events (such as involuntary separations), the opposite is true, and higher than expected rates (i.e., trigger rates over 100%) are unfavorable.

Except for the federal goals for PWD and PWTD participation, EEOC benchmarks are *not* goals. There are no demographic or “diversity” targets related to race, ethnicity, or sex. Demographic benchmarks are only used to identify areas where triggers exist, so that more comprehensive investigations can then be conducted to identify their root causes (which may or may not be discriminatory barriers). A fundamental goal is therefore to determine *why* such demographic disparities exist. Achieving parity with race, ethnicity, or other benchmarks is not an intended outcome.

Demographic Groups:

The demographic groups assessed under EEOC MD-715 are derived from Office of Management and Budget (OMB) Standards for the Classification of Federal Data on Race and Ethnicity⁵⁰ and associated OPM Data Standards. In combination, the OMB and OPM data standards include (and permit) only five selectable race categories⁵¹ and one ethnicity category, and limit sex to either Male or Female. Under MD-715, statistics are presented in combinations of race or ethnicity, plus Male or Female, using the groups shown in the Table 5, below. Two-character abbreviations are used in charts and other figures, in lieu of lengthy plain-language group names, to save space. In the order presented in the MD-715 tables, the groups include:

TABLE 5: Race/Ethnicity/Sex Groups and Respective Abbreviations

Full Demographic Group Title	Abbrev.
Male	M
Female	F
Hispanic or Latino Male	HM
Hispanic or Latino Female	HF
White Male	WM
White Female	WF
Black or African American Male	BM
Black or African American Female	BF
Asian Male	AM
Asian Female	AF
American Indian or Alaska Native (AIAN) Male	IM
American Indian or Alaska Native (AIAN) Female	IF
Native Hawaiian or Other Pacific Islander (NHOPI) Male	NM
Native Hawaiian or Other Pacific Islander (NHOPI) Female	NF
Two or More Races Male	2M
Two or More Races Female	2F

In addition to the race/ethnicity/sex categories, MD-715 also requires assessment of 16 different disability groups (also derived from the OPM Data Standards), including employee/applicant classifications relating to (a) each of the 12 individual targeted disabilities (i.e., PWTD), (b) all disabilities or serious health conditions (including targeted disabilities) (i.e., PWD), and cases where individuals (c) self-identified that they did not wish to identify their disability, or (d) self-identified that they do not have a disability or did not self-identify⁵² (i.e., left forms blank).

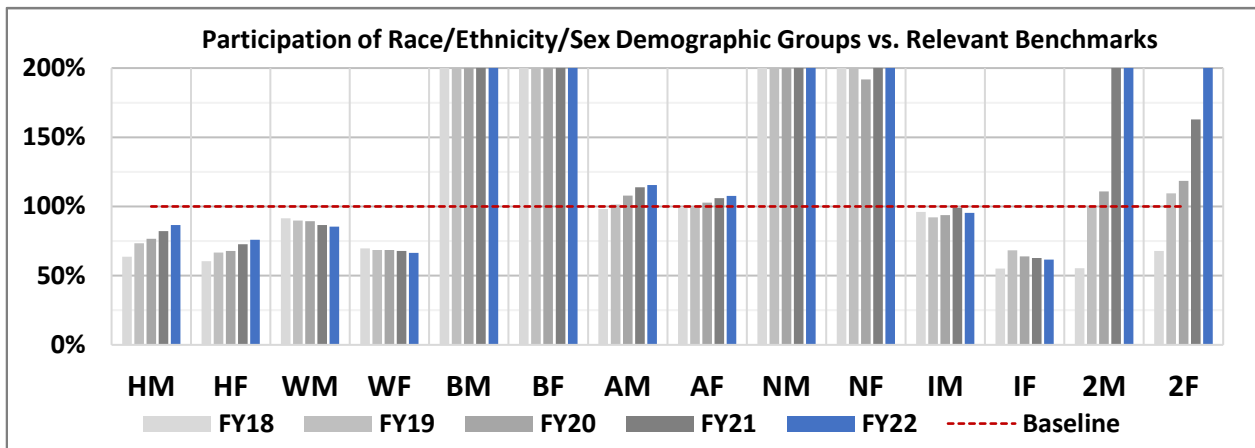
⁵⁰ https://obamawhitehouse.archives.gov/omb/fedreg_1997standards

⁵¹ The Two or More Races category is not selectable, but is based on OMB/OPM business rules, which depend on which of the race categories have been self-identified by employees or applicants.

⁵² If an individual does not self-identify a particular OPM disability code (i.e., leaves the OPM Standard Form 256 blank), the disability status defaults to “I have no disability or serious health condition.”

Analysis of Agency-wide Demographics:

FIGURE 6: Overall Participation of GSA Demographic Groups vs. Relevant Census Benchmarks



Agency level participation of race/ethnicity/gender groups was compared to relevant⁵³ Census benchmarks. Groups with lower-than-expected overall participation rates include Hispanic or Latino Males (HM), Hispanic or Latino Females (HF), White Males (WM), White Females (WF) and American Indian or Alaska Native (AIAN) Females (IF). While participation of employees who identify as AIAN Female is below their respective benchmarks, there are potentially mitigating circumstances relating to differences between how the Census and EEOC allocate multiple race responses to the Two or More Races categories (2M and 2F). Among GSA employees in the Two or More Races categories, a disproportionately high percentage identify as a combination of AIAN and one or more other races. Additionally, overall GSA participation in the Two or More Races category is more than twice the relevant Census rate.

With regard to overall agency-level five-year demographic *trends*, the most significant triggers are for White Females and White Males, which are the only demographic groups to have both (1) lower than expected participation rates and (2) decreasing trends over the past five years (both compared to relevant Census benchmarks). AIAN Females show a similar trend; however, those figures are likely to increase significantly, when 2020 Census data becomes available, as OPM and EEOC rules on data aggregation and allocation are expected to reduce the percentage of employees who are currently categorized as Two or More Races and reallocate approximately half of those employees to the AIAN Female or AIAN Male categories.

⁵³ FY22 benchmarks were revised to align 2014-2018 Census data with EEOC data aggregation rules for Two or More Races groups, improving the less accurate FY21 benchmarks for Black or African American, Asian, American Indian or Alaska Native, and Two or More Races demographic groups.

In contrast to the negative trends for White Females and White Males, almost all other demographic groups have experienced increases in their participation over the past five years, and many of those groups already have higher than expected participation rates. In general, the 2020 Census update is anticipated to further lower the expected participation rates of White Males and White Females and to raise the expected participation rates of other demographic groups. According to the United States Census Bureau, 2020 data should be available in 2023.

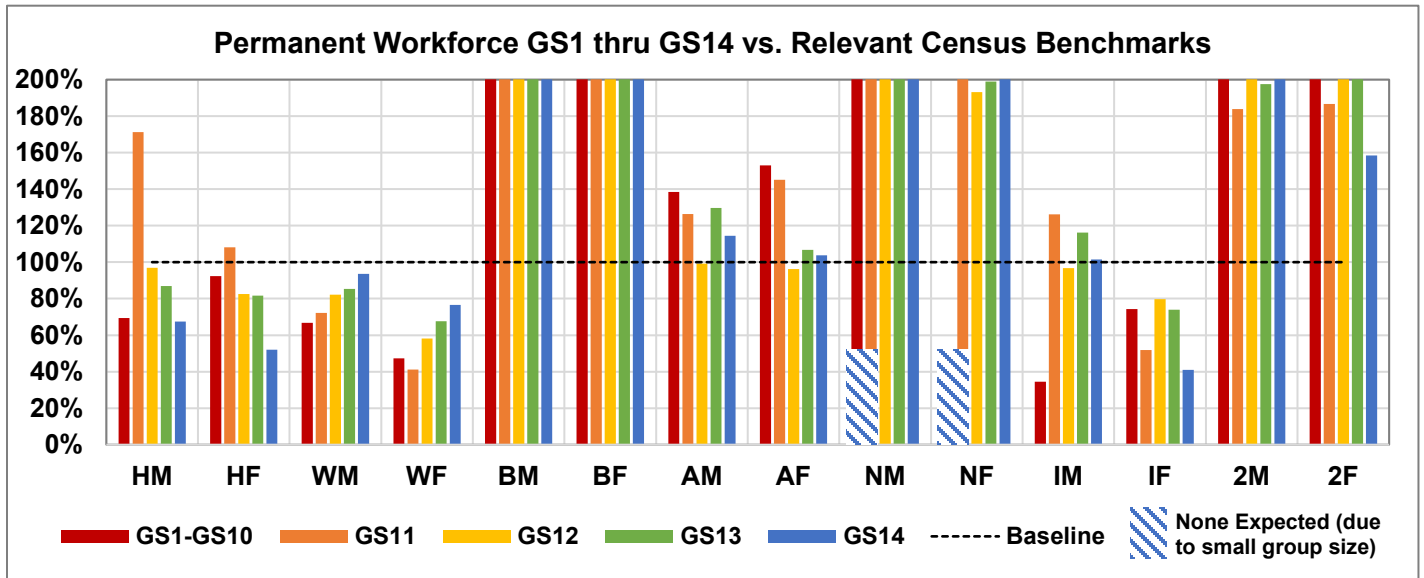
Compared to overall participation rates, analysis of participation rates within each grade level are far more informative. To analyze race, ethnicity, and gender participation by grade level, separate analyses were conducted of (a) grade levels GS1 thru GS14 and (b) grade levels GS15 and higher (including SES and equivalents). Additionally, independent Census benchmarks were developed *for each grade level* by focusing on only the occupational series present in each grade level, along with the respective populations of each of those series and the resulting proportions of those series in each grade level. Additionally, analysis of race, ethnicity, and gender for GS15 and SES also utilized a second relevant Census benchmark, consisting of the demographic rates of “Top Executives” identified in the 2014-2018 American Community Survey.

Analyses that focused on disability status were benchmarked against Federal participation goals for PWD and PWTD (12% and 2%, respectively, within both the GS1-GS10 group and the GS11-SES group), as well as against the overall agency-level participation rates (22.92% for PWD⁵⁴ and 3.43% for PWTD).

⁵⁴ In accordance with 29 C.F.R. § 1614.203(d)(6) GSA must (1) perform a workforce analysis annually to determine the percentage of employees at each grade and salary level who have disabilities and targeted disabilities and (2) take steps to ensure that data collected to support that effort is accurate. GSA has approximately 1,600 employees (13.4%) who self-identified as PWD; however, an additional 1,100 employees (9.5%) have disabilities (as evidenced by other data), but have not self-identified as PWD. To improve data accuracy in support of the annual workforce analysis, those 1,100 employees are temporarily classified as PWD (i.e., without changing their disability status codes in the system of record) using data relating to appointments under hiring authorities that take disability into account and data related to status as a disabled veteran, resulting in an overall PWD participation rate of 22.92%. The PWTD participation rate (3.43%) does not change.

Race/Ethnicity Analysis (GS1 thru GS14):

FIGURE 7: Workforce Participation in Grade Levels GS1 thru GS14 vs. Relevant Census Benchmarks



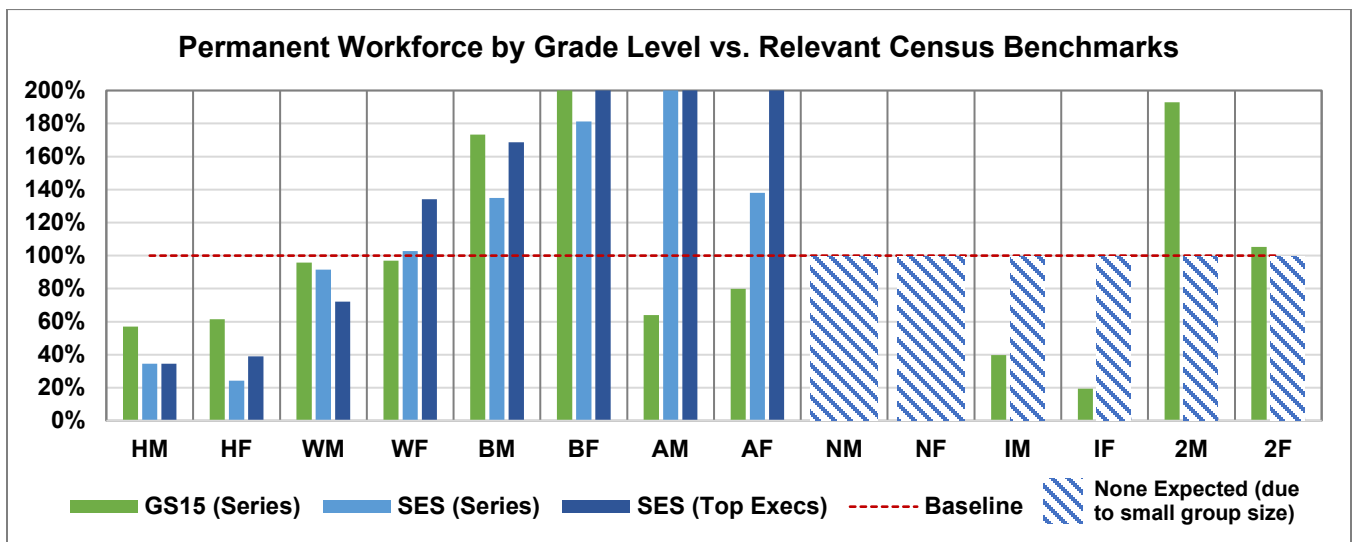
Analysis of grades GS1 thru GS14 found that Hispanic or Latino Males and Hispanic or Latino Females exceed expected participation rates only in the GS-11 grade level, and participate in all other grade levels at lower than expected rates (with decreasing participation rates as grade levels increase). White Male and White Female participation rates are lower than expected in all grade levels, but the rates increase as grade levels increase. In contrast, Black or African American Males and Black or African American Females have significantly higher than expected participation rates in all grade levels, ranging from more than three times the expected rates in grade levels GS1 thru GS12 to more than twice the expected rates in grade levels GS13 and GS14. Asian Male and Asian Female participation rates are very slightly below expected rates at GS12, but higher than expected in all other grade levels. Rates of Native Hawaiian or Other Pacific Islander (NHOPI) employees and Two or More Races employees are significantly higher than expected. Note that no NHOPI are expected in GS1-GS10 or GS11 categories due to very low Census participation rates, coupled with relatively low GSA populations in those grades. Rates of AIAN employees are lower than expected; however, as previously described, that issue is mitigated as a trigger by the low AIAN population, higher than expected proportions of AIAN within the Two or More Races category, and very high Two or More Races participation rates.

The most significant participation triggers in grades GS1 thru GS14 are low rates of Hispanic or Latino Males and Hispanic or Latino Females in the GS14 grade level.

While White Males and White Females have lower than expected participation in grades GS1 thru GS14, their participation rates *increase* as grade levels increase (whereas Hispanic or Latino rates and those of other groups generally do the opposite). Additionally, separate analysis of application data shows significantly lower rates of *applications* of White Males and White Females to lower-grade positions (compared to other demographic groups), but significantly higher rates of *selections* of White Males and White Females, particularly at the GS14 level. Collectively, data in multiple categories (e.g., applications, selections, hires, awards, separations, career development) from the past four years suggests that employment barriers are not a major root cause of the low participation rates of White Males and White Females in grade levels GS1 thru GS14.

Race/Ethnicity Analysis (GS15 thru SES):

FIGURE 8: Participation of GS15 and SES/Equivalents vs. Relevant Census Benchmarks



Analysis of the GS15 and SES grade levels was similar to that of grades GS1 thru GS14, but also added a second benchmark (the “Top Executives” Census category) to provide a perspective that is both unique to high grade levels and independent of occupational series. cursory analysis was performed to consider the applicability of the “Top Executives” benchmark by comparing ratios of Top Executives within the national workforce to populations and percentages of GS15 and SES (and equivalents) within the GSA workforce. Based on the nation-wide populations of both Top Executives (2 million) and the overall workforce (148 million), the Top Executives group comprises approximately 1.4% of the civilian labor force. Applying that ratio to GSA’s 11,970 employees suggests that GSA would have approximately 168 Top Executives. GSA has 117 SES (including equivalents) and 1,008 GS15s, which suggests that the Top Executive benchmark is more relevant to the SES grade level than to the GS15 grade level.

The most significant overall participation triggers in grades GS15 thru SES are low rates of Hispanic or Latino Males and Hispanic or Latino Females.

Hispanic or Latino Males and Hispanic or Latino Females have much lower than expected participation rates in both GS15 and SES/equivalents grades (as do White Males, but to a lesser degree). While AIAN participation is also below the expected rate, the populations of IM and IF are so small that it would take only three additional IM or IF employees to align the participation of those groups to their respective GS15 benchmarks⁵⁵. Asian Males and Asian Females also have lower than expected rates at the GS15 grade level, but have significantly higher than expected rates at the SES level. Black or African American Males and Black or African American Females have higher than expected participation in both the GS15 and SES grade levels, especially Black or African American Females. When using the Top Executive benchmark as a comparator, participation of Black or African American Females among GSA SES and equivalents is the highest of all demographic groups (nearly four times that of the relevant benchmarks).

Mission-Critical Occupations:

As part of the MD-715 process, the EEOC requires agencies to identify, analyze, and report statistics for 10 mission critical occupations (MCO), which are defined in MD-715 as heavily populated occupations that are mission-related and have strong career advancement potential. Collectively, the 10 MCOs used in MD-715 analyses account for 70% of all GSA employees.

TABLE 6: Mission-Critical Occupations

Series	Series Title	Population	Percent of Workforce
1102	Contracting	2,055	17.2%
1101	General Business and Industry	1,760	14.7%
0343	Management and Program Analysis	1,219	10.2%
0301	Miscellaneous Administration and Program	1,121	9.4%
2210	Information Technology Management	854	7.1%
1170	Realty	534	4.5%
0560	Budget Analysis	235	2.0%
0501	Financial Administration and Program	220	1.8%
0201	Human Resources Management	216	1.8%
0905	General Attorney	172	1.4%
		8,386	70.1%

⁵⁵ Achieving parity with benchmarks is not a goal; however, the relative distances between actual rates and benchmarks of various demographic groups is a fundamental first order comparator.

Disability Status Analysis:

Because the Census does not include statistics on disability status, external PWD and PWTD benchmarks come instead from federal percentage goals. Federal goals were originally established in 2007 for only PWTD (2%); however, they were expanded by regulation⁵⁶ in 2017 to (1) add numerical goals for all PWD (12%) and (2) to include independent goals for both low grade and high grade “clusters” (GS1 to GS10 and GS11 to SES, respectively). GSA exceeds the federal goals for both PWD and PWTD in both the low and high grade level clusters.

In addition to mandating PWD and PWTD participation goals for the two grade level clusters, the EEOC also directs agencies to use the same 12% and 2% federal goals as benchmarks for identifying and investigating potential barriers affecting PWD and PWTD participation among (a) the total workforce, (b) new hires, (c) separations, (d) subcomponents, (e) grade levels, (f) salary levels, (g) mission critical occupations, and (h) management positions. In FY22, GSA established internal agency-specific participation goals of 18% for PWD and 3% for PWTD.

Accurate identification and classification of potential PWD and PWTD in GSA’s workforce is complicated by:

- Insufficient data to identify whether disability status codes were self-identified by employees or designated by the agency (such as when forms are left blank)
- Insufficient data to identify when disability codes were last updated or validated
- System limitations that only allow collection of one disability code per employee
- In GSA’s employee data system of record (HR Links), there are often conflicts between OPM disability status codes and other independent data elements that are potential indicators of disability status.
 - Certain veterans’ preference codes (VPC) are positive indicators of an employee’s status as a disabled veteran (independent from the self-identified or agency-designated OPM disability status code), while other VPCs may or may not indicate a service-connected disability. GSA has roughly 1,100 employees who are certainly disabled veterans, but who have not self-identified a disability.

⁵⁶ See 29 C.F.R. § 1614.203(d)(7)

- Certain appointment authorities⁵⁷ are positive indicators of disability status, while other authorities may or may not be indicators of disability status⁵⁸.
 - GSA has 1,300 employees who were appointed under 13 hiring authorities that are permitted to take disability into account; however, 60% of those employees have not self-identified a disability.
 - The Schedule A(u) appointment authority is a special case, as Schedule A(u) hires are *required* to have accurate disability status data; however, the current data system and related procedures are insufficient to prevent inaccurate codes from being entered and maintained.
- Along with “records relating to the individual's appointment under a hiring authority that takes disability into account,” regulations also permit agencies to classify employees as PWD and/or PWTD using records “relating to the individual's requests for reasonable accommodation, if any.”⁵⁹ Requests for reasonable accommodations can be made by employees who are *not* PWD. Consequently, reasonable accommodations requests cannot be used to classify employees as PWD without first validating the disability status of each requestor.
- While regulations permit agencies to classify employees as PWD and/or PWTD using appointment authorities that take disabilities into account and requests for reasonable accommodations, additional guidance from OPM and EEOC is necessary to ensure consistent procedures for addressing data conflicts and to clarify how agencies should balance employee prerogatives related to self-identification (including the right to not self-identify) with agency obligations to compile, maintain, and report accurate data on PWD and PWTD.

As a result of the complexities associated with identification and classification of PWD and PWTD, the disability status data maintained *in the employee data system of record* is limited to (1) codes that were self-identified and (2) entries of “I do not have a disability or serious health

⁵⁷ See 30% or More Disabled Veteran Authority at 5 C.F.R. § 316.302(b)(4) and 316.402(b)(4)

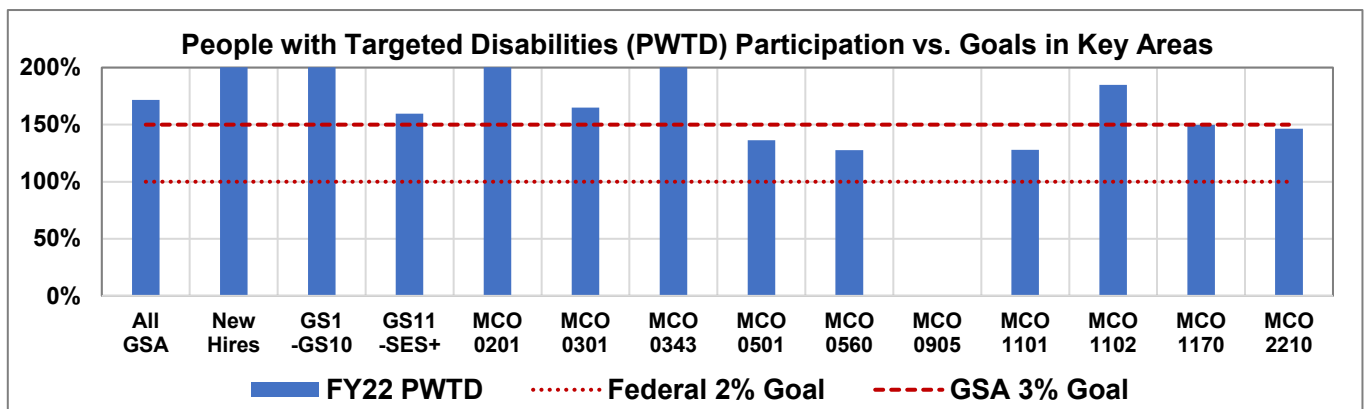
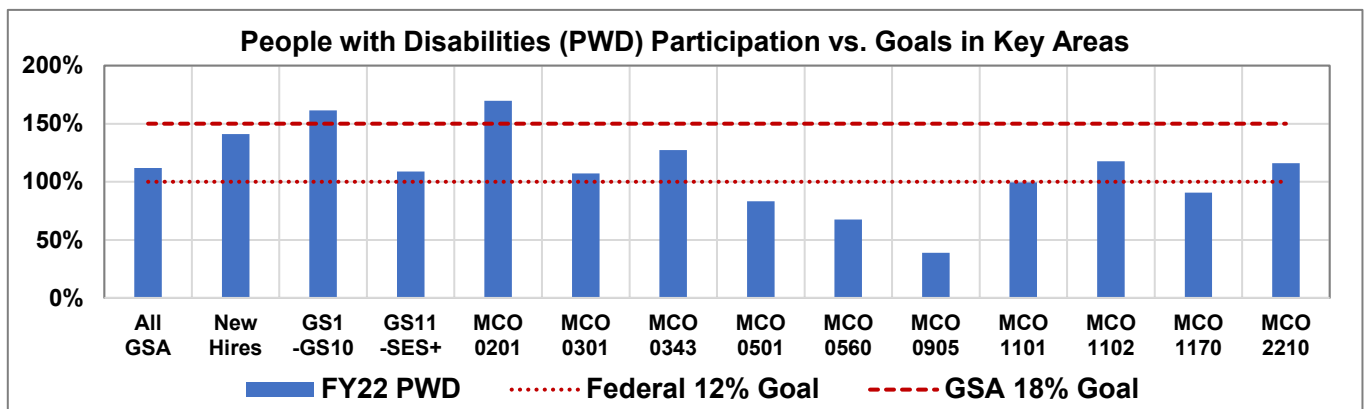
⁵⁸ Under the Veterans' Recruitment Appointment authority (5 C.F.R. § 307), eligibility may be conferred due to receipt of a campaign badge or armed forces service medal, rather than status as a disabled veteran.

⁵⁹ See 29 C.F.R. § 1614.203(d)(6)(ii)

condition” that were designated by the GSA, in cases when employees did not self-identify. In order to improve the accuracy of relevant data as part of mandatory utilization analyses,⁶⁰ GSA currently manually adjusts key agency disability statistics, *outside the system of record*, in order to identify additional PWD using appointment authority codes and veterans’ preference codes that are positive indicators of disability status.

Unadjusted participation rates of PWD and PWTDD were analyzed in several key areas (e.g., overall, among new hires, in each of the low and high grade level clusters, and among each of GSA’s 10 MCOs) and compared to both the GSA and federal participation goals.

FIGURES 9 and 10: Participation of PWD and PWTDD vs. Federal and GSA Goals in Key Areas

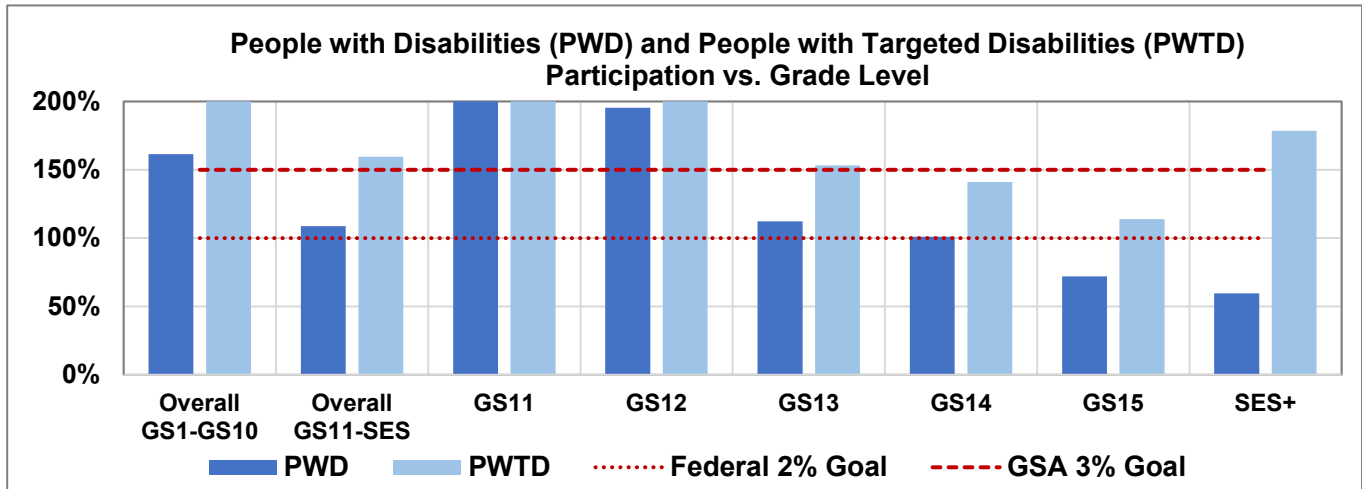


Although the GSA meets the federal goals in both the GS1 to GS10 and GS11 to SES clusters, participation of PWD and PWTDD show significant decreases as grade levels increase, and at grade levels GS15 and SES, PWD participation rates fall below the federal goal benchmarks.

⁶⁰ In accordance with 29 C.F.R. § 1614.203(d)(6)(iii)

The highest participation of PWD occurs in grade levels GS11 and GS12 and the highest PWTD participation rates are in GS11 and below. As such, GSA's performance in the GS11 to SES cluster is achieved primarily through high participation at the low end of that grade cluster.

FIGURE 11: Participation of PWD and PWTD in Grade Levels vs. Federal and GSA Goals



Population Considerations:

In general, population data is less relevant to analyses than participation rates; however, it is important to understand how the population size of each demographic group may affect certain outcomes, and how that might, in turn, affect interpretation of associated results. For example, trends for very small groups often show more variability than large groups, because changes in population will tend to affect those smaller groups more significantly. Additionally, “expected” participation rates (which are generated mathematically) may not be applicable to small groups, because relevant benchmarks may yield “expected” rates equivalent to less than one employee.

TABLE 7: FY22 Race/Ethnicity/Sex Demographic Group Population Statistics

FY22	HM	HF	WM	WF	BM	BF	AM	AF	NM	NF	IM	IF	2M	2F
Population	470	414	4057	2659	1260	1878	488	395	19	16	57	40	98	119
Percentage	3.9%	3.5%	33.9%	22.2%	10.5%	15.7%	4.1%	3.3%	0.2%	0.1%	0.5%	0.3%	0.8%	1.0%

Hispanic or Latino, White, Black or African American, and Asian employees account for 97.1% of the overall workforce. The White and Black or African American groups are the largest (56% and 26% of the workforce, respectively), the Hispanic or Latino and Asian groups are next in size (7% each), and all other groups are comparatively much smaller (collectively, representing only 3% of the overall workforce). Due to their much smaller populations, and very low

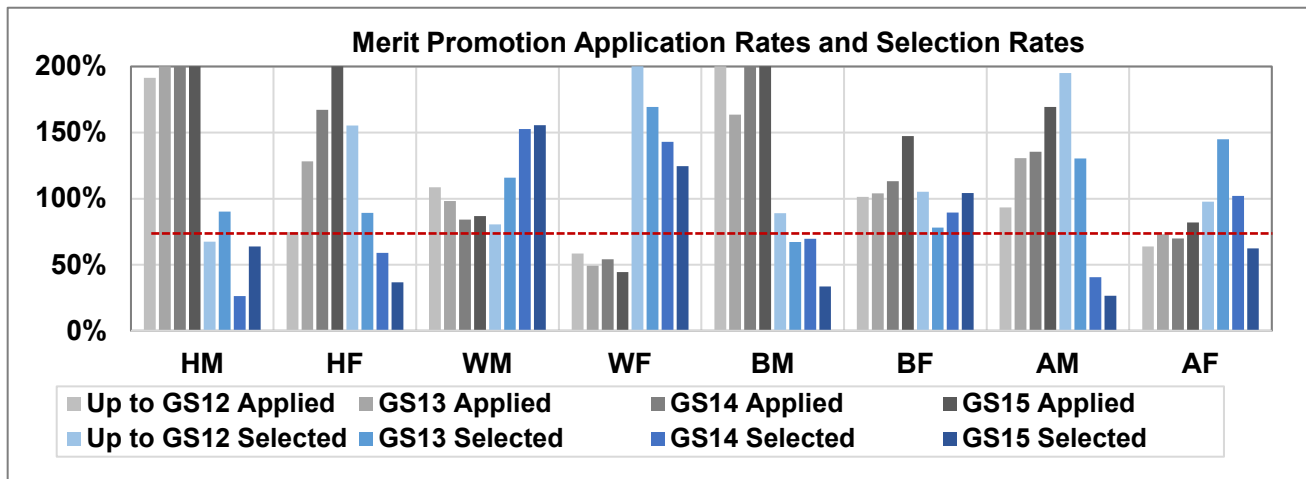
benchmark rates within relevant Census data, analyses of the Native Hawaiian or Other Pacific Islander, American Indian or Alaska Native, and Two or More Races groups sometimes yield results that are atypical of those of the larger demographic groups.

Applicant Demographics:

Analysis of applicant flow data (AFD) included data captured for announcements of (a) internal competitive promotions and (b) external new hires. **The most notable trigger related to AFD was very high rates of White Females among selections/hires for internal competitive promotions.** While favorable for that particular group, the result is also a trigger, because high rates for any one group must be associated with correspondingly lower than expected rates for one or more other demographic groups. **Investigation of triggers related to this situation is the highest FY23 barrier analysis priority,** and is described further, below.

Comprehensive analysis of three years of merit promotion data showed that, aside from White Females and White Males, all groups had high application rates, but low selection rates. Black or African American Males and Hispanic or Latino Males had the most significant decreases between application and selection rates (i.e., both had very high rates of application but very low rates of selection). Hispanic or Latino Females and Asian Males also shared similar profiles of high applications and low selections, but to a lesser degree. In contrast, White Females had both unusually low rates of application and unusually high rates of selection.

FIGURE 12: Merit Promotions – Application Rates and Selection Rates



Changes in application rates and selection rates were also analyzed by grade level. Among most groups, rates of application increased significantly as grade level increased; however, for

White Males and White Females, they show slight decreases with grade. Additionally, White Males are the only group for which rates of selection increased as grade levels increased.

To understand rate changes that occur between the *application* and *selection* milestones in Figure 12, analyses should next focus on data related to *qualification* rates, *referral* rates, and *interview* rates; however, because GSA does not consistently capture interview data (an identified deficiency), subsequent FY22 and FY23 analyses were limited to assessments of qualification and referral rates, and on more refined analyses of applications and selections.

Analysis of qualification rates found that Asian Males, Black or African American Males, and White Males were more likely than average to be considered unqualified, while Asian Females, White Females, and Black Females were more likely than average to be found qualified.

Analysis of qualification rates then assessed referral, selection, and hire rates within each of the “eligible,” “well qualified,” and “best qualified” sub-categories of the overall “qualified” category. That analysis found that, generally speaking, only applicants who were “best qualified” were likely to be referred, and that demographic groups had varying proportions of “best qualified” applicants (e.g., Black or African American Females and Hispanic or Latino Females had the lowest proportions of “best qualified” applicants and Asian Males and Asian Females had the highest proportions). The analysis also considered the potential impacts (on “best qualified” rates) of the 5 and 10-point preferences afforded eligible applicants who are disabled veterans.

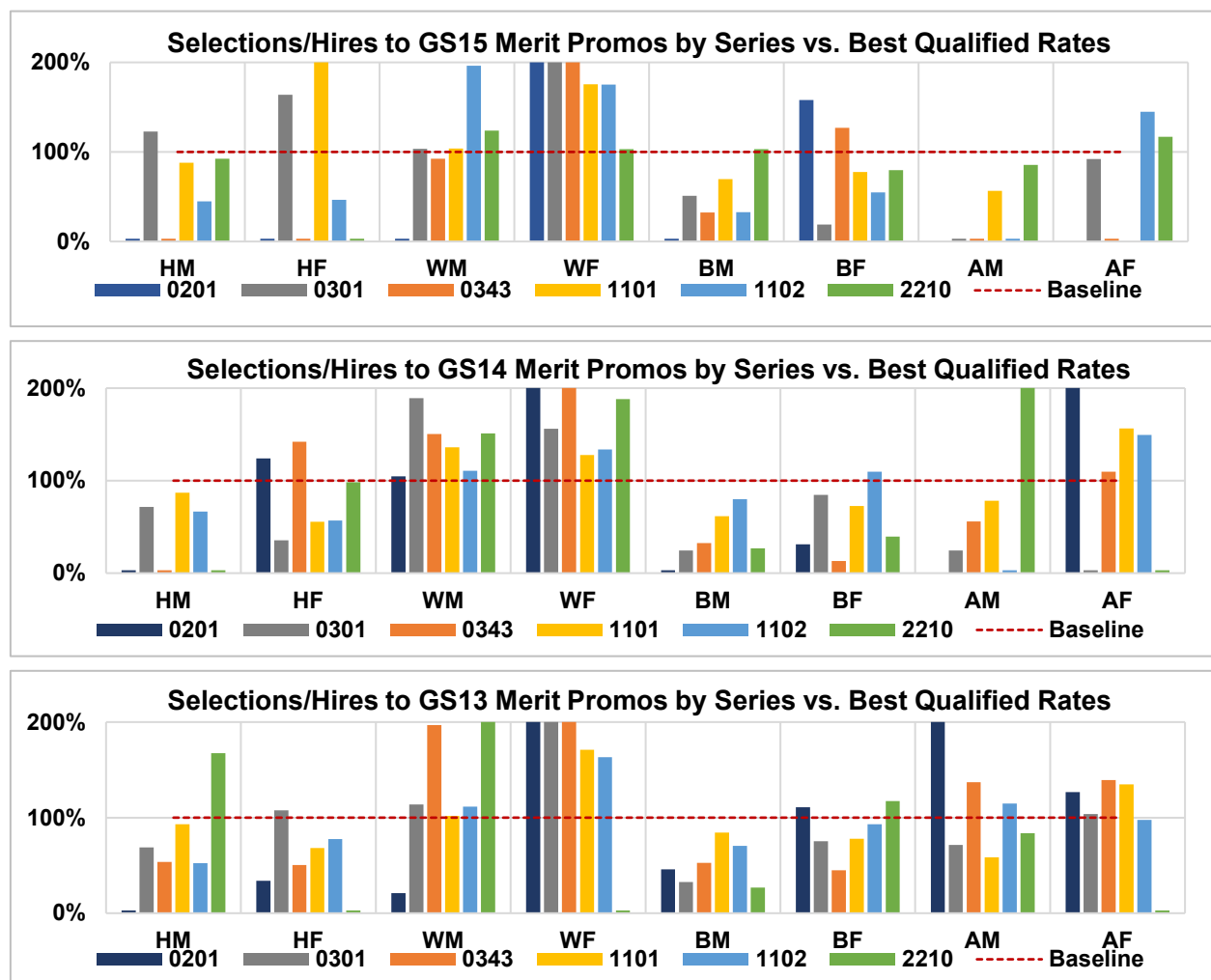
While only “best qualified” applicants are typically referred, having a high proportion of “best qualified” applicants was found to not be a good predictor of high selection rates. For example, Asian Males had very nearly the highest proportion of “best qualified” applicants, but also had the very lowest proportion of selections/hires of any demographic group. **The most notable overall finding was that White Females had exceptionally high proportions of selections/hires** (nearly twice that of White Males, the next highest group).

Deeper analysis of that situation evaluated 195,000 applications from multiple announcement types, including (1) delegated examining, (2) direct hire authority, (3) Pathways program recent graduates, (4) Pathways program internships, (5) merit promotions, (6) SES announcements, (7) applicant supply announcements, (8) standing register, (9) Interagency Career Transition Assistance Plan (ICTAP), (10) term appointments, and combinations thereof. Merit promotions were found to not only have the highest overall volume of applicants (54% of all announcement types), but also the highest percentage of applicants who self-identified race/ethnicity (78%).

For those applicants who self-identified race/ethnicity, merit promotion applications accounted for 46% of GS1-GS11 applications, 56% of GS12 applications, 64% of GS13 applications, and 69% of GS14 applications, but only 44% of GS15 applications.

Subsequent analyses concentrated on merit promotions to grade levels GS13, GS14, and GS15. Based on available data, that analysis (summarized in Figure 13) was further refined to focus on the six series with the highest numbers of applicants who self-identified race/ethnicity (occupational series 0201, 0301, 0343, 1101, 1102, and 2210).

FIGURE 13: Selection/Hire Rates to GS13/GS14/GS15 Merit Promotions vs. Best Qualified Rates



As identified during the previous analyses, the most prominent data finding was that **rates of White Female selections/hires far exceeded their respective rates within the relevant best qualified applicant eligibility pools.** Their high rates of selection/hire grew more significant as

grade level increased (averaging 175% at GS13, 215% at GS14, and 250% at GS15).

Among other demographic groups competing for merit promotions at those grade levels and to those series, the only other groups with predominantly favorable selection/hire rates were White Males (except to series 0201 (Human Resources Management)) and Asian Females (to four of the six series at GS13 and GS14). Most other demographic groups were selected/hired at higher rates to only a few particular series and/or grade levels; however, **Black or African Males were selected/hired at low rates (below their rates within the best qualified pools) in every series and every grade level** (except 2210 (IT Management) at GS15, where they were only selected/hired at the same rate as their rate within the best qualified pool). Overall, **Hispanic or Latino Males, Hispanic or Latino Females, Black or African American Males, and Black or African American Females all had predominantly low selection/hire rates for most of the occupational series in each of the three grade levels.**

There are several significant shortfalls affecting GSA's AFD. **The most significant AFD issue is the lack of data related to applicant interview rates. That deficiency prevents effective barrier analysis of the triggers described above associated with merit promotions to high grade levels.** Because GSA does not consistently capture or maintain interview statistics, that was reported as a compliance deficiency in FY21. That issue was subsequently acknowledged by the EEOC in their September 30, 2021 feedback to GSA regarding the completeness and accuracy of GSA's FY20 MD-715 data.

One additional significant overarching issue relates to very low rates of voluntary self-identification during the application process, particularly disability status identification by existing employees applying for internal competitive promotions. While approximately 70% of applicants self-identified race/ethnicity/gender statistics, only 6% volunteered their disability status.

One final challenge related to AFD is the use of direct hire authorities. Specifically, because employees hired under direct hire authorities do not go through the traditional application process, there is subsequently limited AFD available for analysis (e.g., data documenting statistics on their rates of qualification, referral, interview, and selection). Because the most widely used appointment authority for current GSA employees is a direct hire authority (Appointment Authority Code AYM), the lack of AFD creates an analysis challenge. Similarly, appointments of both (a) occupational series 0905 (General Attorney (a mission critical occupation)) and (b) SES also typically lack relevant AFD. In each of those three areas,

demographic outcomes involve triggers that warrant deeper root cause analysis. Meaningful analysis of those issues will be difficult without more comprehensive AFD.

Appointment Authority Analysis:

Hiring authorities used for current GSA employees were identified and evaluated, along with their respective demographic outcomes, both for the overall workforce and for just GS-13, GS-14, and GS-15 positions. Analysis of appointment authorities yielded several notable findings:

- Ten hiring authorities account for 76% of all current GSA employees and 25 authorities account for 95% of all employees.
- The most widely used appointment authority (Appointment Authority Code AYM, used for 16% of current GSA employees) is a direct hire authority.
- Proportional use of the AYM hiring authority generally increases with grade level (e.g., 12% of GS-12 and below, 17% of GS-13s, 16% of GS-14s, and 26% of GS-15s were appointed under that hiring authority).
- Participation of White Males appointed under Authority Code AYM increases with grade level (18% of GS-12 and below, 24% of GS-13s, 31% of GS-14s, and 37% of GS-15s).
- Hiring authorities available only to veterans tended to result in higher participation rates for Males (including Black or African American Males and Hispanic or Latino Males), relative to Females. Given the generally high proportions of Males among the military services, along with the nature of the National Civilian Labor Force benchmark (which excludes military personnel) those Male-heavy outcomes were expected.
- Hiring authorities that take disability into account (such as Schedule A(u) authorities and authorities associated with disabled veterans⁶¹) similarly resulted in predictable outcomes that include higher participation rates of PWD and PWTD.
 - Use of the Schedule A(u) appointment authority decreases as grade levels increase (e.g., 3.5% of GS-12 and below, 1.3% of GS-13s, 0.5% of GS-14s, and 0.3% of GS-15s).

⁶¹ Appointment authority ZBA (Veterans Employment Opportunity Act (VEOA) authority), J8M (Veterans Recruitment Appointment (VRA) authority), LBM (Appointment of Disabled Veteran from a Veterans Affairs (VA) Program), LYM (Conversion of VRA appointees), LZM (Conversion of 30% or More Disabled Veteran), NEM (Temporary Appointment of 30% or More Disabled Veteran)

- Analysis of PWD statistics uncovered widespread inconsistencies between OPM veterans' preference codes and disability status codes (which may have been self-identified or agency-designated). Overall, 1,068 disabled veteran employees (67%) were found to have no disabilities identified within the system of record, including 17% of disabled veterans who self-identified that they did not wish to disclose their disability or serious health condition.
- Analysis also uncovered inaccurate OPM disability codes for employees appointed under the Schedule A(u) hiring authority (an excepted hiring authority that *requires* accurate disability status information after hire). Many Schedule A(u) hires were found in the system of record to have no self-identified disability. Further analysis also found that Schedule A(u) hires have routinely not been converted to the competitive service after two years on probationary status.⁶²

Career Development Analysis:

Barrier analysis of career development data focused on eligibility pools, nomination data, and selection data for 27 different CDP courses offered in FY22. There were several notable findings from the analysis of the FY22 CDP data:

TABLE 8: Comparison of Eligibility, Nomination, and Selection Rates of Key Groups to FY22 Competitive Development Programs

	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Nomination Rate vs. Eligibility Rate	123%	38%	86%	98%	139%	104%	63%	114%	105%	168%
Selection Rate vs. Nomination Rate	81%	199%	127%	120%	45%	60%	100%	100%	114%	163%

- Hispanic or Latino Males, Black or African American Males, and Black or African American Females were all *nominated* to CDPs *at higher rates* than expected (compared to rates within eligibility pools); however, all three groups were subsequently *selected* to CDPs *at lower rates* than expected (compared to rates within nomination pools). This is particularly significant with Black or African American Males.
- Both White Males and White Females were selected at higher rates than expected.

⁶² While not mandatory, conversion of Schedule A(u) hires into the competitive service is the intention of Executive Orders 12125 and 13124. If all eligible Schedule A(u) hires are not converted after two years, agencies must explain in Part J of the annual MD-715 report why they were not.

- PWD and PWTD were nominated for CDPs at higher rates than their rates within respective eligibility pools, and were also selected at higher rates, relative to their rates within the nominee pools.

Organizational Climate Survey Analysis:

Major Federal Employee Viewpoint Survey (FEVS) indices are favorable:

TABLE 9: GSA FEVS Scores and Response Rates

Index or Measure	FY19	FY20	FY21	FY22
Employee Engagement	78%	83%	83%	83%
Global Satisfaction	77%	82%	80%	78%
Leaders Lead	69%	78%	77%	77%
Supervisors	85%	89%	90%	90%
Intrinsic Work Experience	79%	84%	83%	82%
Response Rate			60%	68%

- Overall GSA scores are high, compared both to Government-wide scores and agencies of comparable size⁶³. Scores remain higher than pre-pandemic levels; however Global Satisfaction and Intrinsic Work Experience have both fallen each year since 2020.
- According to the 2022 OPM FEVS Government-wide Management Report, among large agencies:
 - GSA achieved the Top Increase in Response Rate, increasing 8 percentage points from 2021 to 2022, from 60% to 68%.
 - GSA is identified as Top Agency⁶⁴ for the Employee Engagement Index (EEI), Global Satisfaction Index, Performance Confidence Index, and DEIA Index scores.

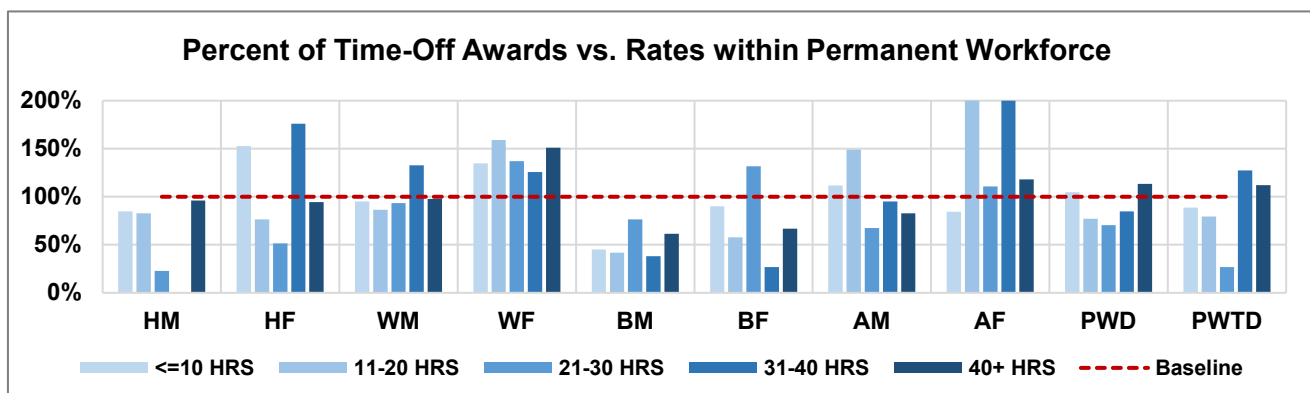
⁶³ The GSA is considered a Large Agency (those with 10,000 to 74,999 employees).

⁶⁴ The National Aeronautics and Space Administration (NASA) has been the Top Agency of comparable size for several years. GSA's status as Top Agency in 2022 is due to NASA's decision to not participate in the Government-wide FEVS in 2022, but to instead administer their FEVS internally. According to their 2022 survey results, their response rate and index scores are all higher than GSA's (https://www.nasa.gov/sites/default/files/atoms/files/2022_fevs_aes_web_report.pdf).

Awards Analysis:

Analysis of monetary awards from FY20 to FY22 showed general (and expected) correlations between award amounts and grade levels. Analysis of time-off awards showed wide variations across demographic groups. Because time-off awards are often elected (in lieu of monetary awards), the root causes for differences between award rates are not readily apparent. The most consistent findings are that **White Females received a higher than expected percentage of hours in every range of time-off awards, while Black Males received a lower than expected percentage of hours in every range of time off awards.**

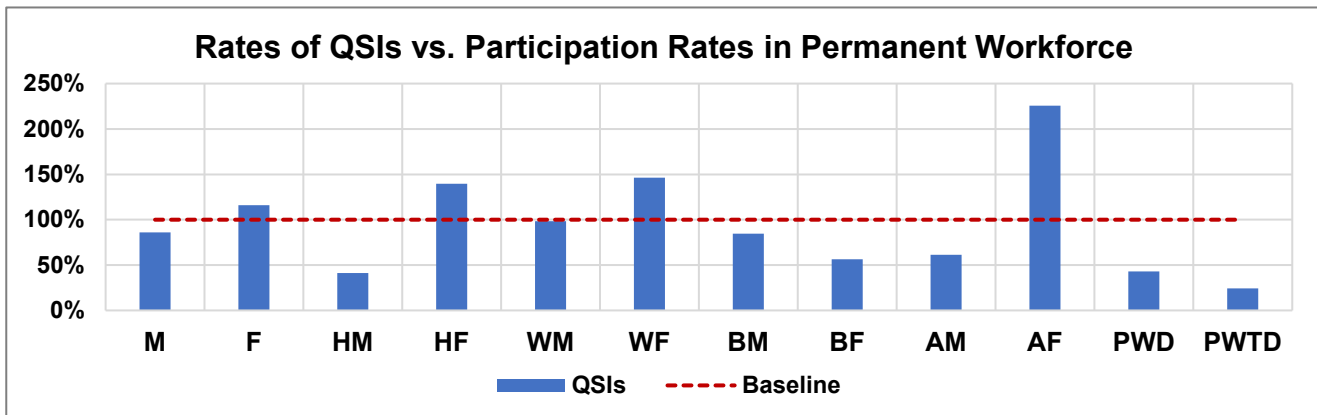
FIGURE 14: Time-Off Awards



Analysis of Quality Step Increases⁶⁵ (QSI) are depicted on the next page. They show that, overall, all Female groups except one received QSIs at a higher rate, relative to their participation in the workforce. **Black or African American Females received QSIs at a significantly lower rate than expected.** Hispanic or Latino Males, Asian Males, and PWD/PWTD also received QSIs at a lower per-capita rate.

⁶⁵ Awards in the QSI category pertain to OPM Nature of Action Code (NOAC) 892. For GS employees, they include “Quality Increases” and for SES, they include “Adjustments” under the broader category within the EEOC Instructions of “Performance-based Pay Increases Provided on Irregular Basis.”

FIGURE 15: Rates of Quality Step Increases vs. Participation Rates in Permanent Workforce



Secondary analyses of FY22 QSIs (and SES performance-based pay increases provided on an irregular basis) assessed their distribution among GSA’s mission critical occupations, large Services and Staff Offices (SSO), and by grade level. Those analyses showed:

- GSA’s two most populous occupational series (1102 (Contracting) and 1101 (General Business and Industry)) received QSIs at a significantly lower per-capita rate than all other occupational series, except 0560 (Budget Analysis). In contrast, occupational series 0201 (Human Resources Management) received QSIs in FY22 at a significantly higher per-capita rate than all other occupational series.
- Regarding GSA’s organizational components, among SSOs with at least 250 employees, the two most populous (PBS (Public Building Service) and FAS (Federal Acquisition Service)) received QSIs at a significantly lower per-capita rate than all other SSOs. In contrast, the Office of Human Resources Management (OHRM) and Office of Inspector General (OIG) received QSIs at significantly higher per-capita rates than their peers.

TABLE 10: QSIs by Occupational Series

Series	QSIs	Population	Per Capita Rate
0201	10	216	4.63%
0301	21	1121	1.87%
2210	13	854	1.52%
0501	3	220	1.36%
0343	14	1219	1.15%
1170	5	534	0.94%
1102	15	2055	0.73%
1101	8	1760	0.45%
0560	1	235	0.43%

TABLE 11: QSIs by Service or Staff Office

SSO	QSIs	Population	Per Capita Rate
OHRM	11	326	3.37%
OIG	8	264	3.03%
OCFO	6	518	1.16%
GSA IT	5	458	1.09%
FAS	32	3772	0.85%
PBS	38	5450	0.70%

- Per-capita distribution of QSIs (and SES performance-based pay increases provided on an irregular basis) increased with grade level.

TABLE 12: QSIs by Grade Level

Grade	QSIs	Population	Per Capita Rate
ES00	7	103	6.80%
GS15	28	1008	2.78%
GS14	48	2283	2.10%
GS13	29	3497	0.83%
GS12	9	3392	0.27%
GS11	1	658	0.15%

E.9 Accomplishments

In FY22, GSA had several noteworthy accomplishments related to EEO:

- In October, 2021, GSA revised its organizational chart to more clearly show the direct reporting relationship between the Associate Administrator for OCR and the agency Administrator, resolving the associated deficiency identified in the FY20 MD-715 report.
- In October, 2021, GSA launched its new Persons with Disabilities Special Emphasis Program in a virtual event communicated by the GSA Administrator. Hosted by the GSA Deputy Administrator, the event emphasized how GSA can do more to foster belonging for employees with disabilities. The event featured presentations by the Senior Advisor for Equity and the GSA Affirmative Employment Program Manager and included an overview of EEOC MD-715 and GSA's FY21 MD-715 findings, efforts, data, analyses, and future plans related to PWD and PWTD, with goals of increasing attendee awareness of PWD and PWTD participation across GSA; PWD-related barriers; and GSA's plans and efforts to improve recruitment, hiring, advancement, and retention of PWD and PWTD.
- In October, 2021, the AbilityOne Program hosted training for the GSA acquisition workforce. The AbilityOne program is one of the largest sources of employment for people who are blind or have other significant disabilities, supporting them as they provide billions of dollars' worth of quality products and services to federal agencies each year. The training featured speakers from the AbilityOne Commission, SourceAmerica, and the National Industries for the Blind.
- In October, 2021, GSA co-hosted the Annual Interagency Accessibility Forum. The Forum was sponsored by the Federal Chief Information Officer Council's Accessibility Community of Practice and hosted by the Government-wide Information Technology (IT) Accessibility Program from GSA's Office of Government-wide Policy, along with the Department of Health and Human Services, the Department of Labor, and the Merit Systems Protection Board, in partnership with other federal agencies. During the event, attendees heard from leaders in accessibility in the federal government as well as from the private, academic, international, and non-profit sectors. The event included presentations and panel discussions that focused on accessibility as a foundation for inclusion, diversity, and equity within the federal government. The forum also included virtual exhibitions by accessibility consultants and IT companies with accessibility products and services that support those with disabilities.

- In October, 2021, the AEPM provided a tailored presentation to the Hispanic Special Emphasis Program Managers and their Executive Sponsors on EEOC MD-715 and GSA's FY21 MD-715 findings, efforts, data, analyses, and plans related to Hispanics and Latinos.
- In November, 2021, the Deputy Associate Administrator for OCR was formally appointed as the new Associate Administrator for OCR.
- In November 2021, the GSA OHRM hired a DEIA Program Manager, filling a critical position that had been gapped for three years and providing a human resources counterpart to collaborate with the AEPM. Additionally, the new hire is also GSA's Special Placement Program Coordinator, as well as program manager for both the Federal Equal Opportunity Recruitment Program and Disabled Veterans Affirmative Action Program, three human resources recruitment programs with close ties to the AEP. In April 2022, a second DEIA Program Manager was hired to further support those OHRM programs and AEP efforts.
- In December 2021, an inaugural class of 25 GSA employees began the "IDEA Champions" Program, a competitive development program intended to develop cohort members into agency resources for thought partnership and to provide participants with leadership tools to support GSA's DEIA strategic priorities. The cohort participated in 12 weekly virtual sessions and a 5-day facilitator training workshop, then spent 4 months researching and developing capstone projects that they presented to GSA's senior executives in July 2022. All of the projects were aligned with priorities being advanced through GSA's March 2022 DEIA Strategic Plan, Equity Action Plan, and the agency's 2022-2026 Strategic Plan.
- In December 2021, GSA updated its reasonable accommodation policy and procedures⁶⁶ and in January 2022, the EEOC certified that the revisions were fully compliant with Section 501 of the Rehabilitation Act of 1973.
- In January, 2022, following re-baselining of MD-715 benchmarks using 2014-2018 Census data, the AEPM provided an updated presentation to the Hispanic SEPMS on how the changes affected data, analyses, and future plans related to Hispanics and Latinos.
- In February, 2022, GSA Information Technology (GSA IT) contracted with a new live close captioning service vendor to provide Communication Access Realtime Translation (CART) services to support GSA closed captioning needs, replacing the Federal Relay Service Live Close Captioning Service. Additionally, GSA IT's Live Captioning page on

⁶⁶ Covering all of GSA, except the GSA Office of the Inspector General.

GSA's employee intranet site (GSA InSite) was enhanced with information on the new CART service and how to access it.

- In February 2022, as part of GSA's Black History Month activities, the Benjamin Banneker Chapter of Blacks in Government (BIG) hosted a virtual celebration promoting health and wellness, improving workplace culture, and building diverse, high-performing teams. Opening remarks were provided by the GSA Administrator. The event also featured other senior GSA leaders, and the keynote speaker was Harvard Fellow Anton Gunn, a former senior advisor to President Obama.
- In March 2022, GSA launched its DEIA Strategic Plan. The plan reinforces GSA's vision for a "people-first culture prioritizing DEIA" in the agency's overarching 2022-2026 Strategic Plan and responds to Executive Order 14035. One of its key focus areas aligns directly with affirmative employment goals: improving equity throughout operational policies, practices, and the employee lifecycle (e.g., recruiting, hiring, advancement, and retention).
- In March 2022, GSA's Women's Special Emphasis Program (WSEP) and the Talent Development Division within the OHRM co-hosted an annual Women's History Month Virtual Mentoring event with senior GSA leaders.
- In April, 2022, GSA launched its PWD SEP newsletter, GSAbility News, as a key source of information on events, topics, and programs relating to PWD.
- In May 2022, GSA recognized Asian American, Native Hawaiian, and Pacific Islander Heritage Month by hosting an agency-wide "Fireside Chat" with senior GSA leaders.
- In June, 2022, GSA's held its inaugural Juneteenth Celebration. The event was hosted by the Benjamin Banneker Chapter of BIG, in collaboration with the Latimer Chapter of Federally Employed Women (FEW), the GSA Diversity and Inclusion Advisory Group, and the DEIA Speaker Series, and was attended by more than 900 GSA employees and 200 participants from other agencies.
- In June 2022, GSA's Public Building Service authorized the Pride Flag to be flown during June at any federal building managed by GSA upon request by the tenant agency. PBS also assisted GSA's Federal partners in procuring new flags and hardware for those who needed it. More than 40 federal buildings across the country opted to raise the Pride Flag to show their support of diversity, equity, and inclusion in the federal workforce and in the communities we serve nationwide. Additionally, the Intersex-Inclusive Progress

Pride Flag, the newest Pride Flag that expanded on Gilbert Baker's original 1978 rainbow-colored design, was flown at GSA's headquarters for the first time during the entire month.

- In June, 2022, the GSA AEPM began analyzing participant data related to agency cultural awareness events, to better understand attendance demographics, identify potential triggers, and determine opportunities for improving cross-cultural outreach.
- In June, 2022, GSA sponsored a webinar on "Fostering LGBTQ-Friendly Workplaces, in partnership with the EEOC Chicago District Office and Equality Ohio, a statewide LGBTQ+ advocacy and legal aid organization.
- In June 2022, OCR and OHRM implemented regular meetings to improve collaboration on MD-715, barrier analysis, and tracking of progress on planned OHRM activities.
- In July 2022, the Partnership for Public Service released annual rankings identifying GSA as being among the top five Best Places to Work among midsize⁶⁷ agencies.
- In August 2022, a new annual Administrator's EEO policy statement was issued.
- In August, 2022, GSA established agency-specific goals for PWD and PWTD participation in the workforce of 18% for PWD and 3% for PWTD. The new agency goals exceed their respective federal goals (12% for PWD and 2% for PWTD) by 50%.
- In September, 2022, GSA's Hispanic SEP hosted an event for Hispanic Heritage Month highlighting artists of Hispanic descent with works represented among the GSA Fine Arts Collection.
- In September, 2022, GSA participated in the Historically Black Colleges and Universities (HBCU) Recruitment Fair in Washington DC, showcasing employment opportunities at GSA to recent or soon to be graduates of historic universities. Outreach targeted individuals who qualified for the Pathways program and direct hire authorities, and recruited for multiple occupational series, including GSA's mission critical occupations.
- In September, 2022, GSA's National Accessibility Program completed its decennial recertification process, demonstrating the program's maturity and stability.

⁶⁷ Agencies with 1,000 to 14,999 employees

- In September, 2022, GSA modified its Alternative Benchmark Tool to improve upon FY21 benchmarks for Two or More Races, Black or African American, American Indian or Alaska Native, and Asian demographic groups. The corrections address shortfalls in 2014-2018 Census data to improve the accuracy of the GSA MD-715 data tables and analyses, pending release of demographic data from the 2020 decennial Census.
- In September 2022, GSA signed a contract to move GSA to a new centralized, agency-wide funding model for American Sign Language (ASL) services. The contract aims to streamline processes and improve experiences of employees who are deaf or who have hearing impairments.
- In FY22, OCR developed EEO-focused language that was incorporated into the “Leading Change” and “Leading People” common elements of all FY23 SES performance plans.
- In FY22, GSA’s competitive development program course offerings were expanded, from 6 in FY19, 7 in FY20, and 11 in FY21, to 27 grade-specific course offerings in FY22.
- In FY22, GSA worked with OMB and OPM, in collaboration with the President’s Management Council, to administer the Government-wide Pulse Survey Pilot, which invited Federal employees to answer questions related to employee engagement, equity, and inclusion. During the three survey efforts (October 2021, January 2022, and March 2022), GSA’s employee participation rate averaged 2.5 times the Government-wide average, and was the second highest of all agencies during the January and March surveys. In addition to strong participation, the positivity of GSA responses to questions related to equity, diversity, and inclusion consistently outpaced Government-wide results and GSA also had a higher percentage of employees (except for NASA) who strongly agreed that “agency leadership shows that diversity and inclusion are important through their actions.”
- Results of the 2022 FEVS were released in October, 2022. GSA scored favorably in all indices and improved its employee response rate by 8 percentage points, compared to the 2021 FEVS rate, earning recognition for the “Top Increase” among large agencies.
- Throughout FY22, the OCR provided training to 2,140 employees on ten different topics, including unconscious bias, civil treatment for employees and supervisors, supervisory EEO responsibilities, new employee orientation, settlement official training, DEIA, civil rights, MD-715, and environmental justice, as well as various EEO-related speaker series topics.

- Throughout FY22, GSA participated in and/or hosted a wide variety of programs for many varied groups, including the Federal Inter-Agency Holocaust Remembrance Program and GSA's DEIA Speaker Series, featuring recognized leaders and diversity professionals whose efforts, experiences, and advocacy inspired greater appreciation for inclusive excellence and encouraged diverse ideas and perspectives. Examples of FY22 programs include National Arab American Heritage Month, Native American Heritage Month, Women's History Month, LGBTQ+ Employment Protections, and a Pride Month session on Pronouns.
- Beyond providing formal training to just supervisors and managers, GSA requires *all employees* to regularly receive comprehensive training covering all EEO topics addressed in the Part G self-assessment. At the end of FY22, 99.86% of all employees and 99.91% of all supervisors/managers were compliant with those training requirements.

E.10 Planned Activities

In FY23 GSA intends to:

- Improve collaboration between the OCR and OHRM on execution and reporting of MD-715 assessment activities, including, but not limited, to annual compliance evaluations, trigger identification, and barrier analysis, as well as tracking of reported plans to correct identified deficiencies and eliminate identified barriers.
- Improve management and oversight of Schedule A(u) hiring, with specific goals of proactively tracking performance and eligibility of Schedule A(u) hires throughout their respective probationary periods and ensuring timely compiling of Schedule A(u) information required to support MD-715 analyses, assessments, and reporting obligations. The OHRM will issue guidelines on the use of Schedule A(u) and will begin addressing conversions of Schedule A(u) hires, first by ensuring more timely conversions of employees currently within their probationary periods and then by converting eligible employees who have previously completed their probation periods, beginning with more recent Schedule A(u) appointments.
- Prioritize:
 - Implementation of improvements to tracking, oversight, and management of requests for reasonable disability-related accommodations that are approaching or have exceeded GSA's 30-day processing time limit.
 - Implementation of annual OHRM validations of key data elements related to (1) employees appointed under the Schedule A(u) hiring authority for persons with severe physical disabilities, intellectual disabilities, or psychiatric disabilities; (2) employees hired under other authorities that take disabilities into account; (3) employees in temporary status, (4) employee disability status and (5) employee race/ethnicity.
 - Implementation of selection panels for GS13/14/15 merit promotions to key occupational series, as well as associated requirements governing selection panel composition, training, and record keeping. That effort is designed to enable GSA to conduct more effective investigations of significant FY22 triggers; however, it will also implement measures that will serve to reduce potential discrimination in the selection process.
 - Implementation of MD-715 requirements to collect, maintain, and report statistical data on *interviewed* applicants (in addition to qualified, referred, and selected applicants) and data on all external new hires, including direct hires and senior executive positions.

Part F – Certification of Establishment of Continuing EEO Programs

Aluanda Drain, Associate Administrator of the Office of Civil Rights, is the Principal EEO Official for the U.S. General Services Administration (GSA).

The agency has conducted an annual self-assessment of Title VII Section 717 and Rehabilitation Act Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program are included with this Federal Agency Annual EEO Program Status Report.

The Agency has also analyzed its workforce profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure, or practice is operating to disadvantage any group based on race, national origin, gender, or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.



Aluanda Drain
Associate Administrator, Office of Civil Rights

5/30/2023

Date

I certify that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.



Robin Carnahan
Administrator, General Services Administration

5/30/2023

Date

Part G – EEO Program Self-Assessment Checklist

GSA conducted a mandatory annual assessment of its EEO Program by completing the MD-715 Part G Checklist (along with evaluating assessment measures in Part J). The Part G checklist will be submitted to the EEOC via EEOC's Federal Sector EEO Portal (FedSEP) and associated supporting documentation and data will be maintained within the GSA OCR.

For each Part G measure for which a deficiency is identified, the FedSEP system automatically creates an associated Part H plan, a blank template which the agency must then complete to document (1) the GSA official with responsibility over the measure found to be non-compliant, (2) planned activities that will be executed to resolve the deficiency, (3) target dates by which each planned activity will be completed, and (4) the target date by which the entire deficiency will be corrected.



Because many of the identified deficiencies are interrelated, related deficiencies are often resolved through the same planned activities. As such, certain Part H corrective plans address several different deficiencies; however, because FedSEP automatically creates blank templates for each deficiency, several of the FY22 Part H plans are therefore only "placeholders." Those placeholder Part H plans may not contain planned activities, but will instead simply reference other Part H plans that do contain the relevant planned activities and target dates associated with correction of that deficiency (and related deficiencies).

None of the 30 Part G deficiencies reported in FY21 were resolved during FY22. As such, the same 30 issues are included in this report, along with 1 new deficiency. The additional FY22 deficiency occurred because GSA did not implement the barrier elimination plans that were reported in FY21, including meeting the reported target completion dates for planned corrective activities. Table 12 on the next page summarizes all 31 current deficiencies, after which follows the official EEOC Part G self-assessment checklist in its entirety.

TABLE 13: FY22 Part G Self-Assessment Deficiencies



Measure					Questions	Part H	
1	A	2	b	1	Does the agency prominently post the business contact information for its Special Emphasis Program Managers throughout the workplace and on its public website?	H.1	
2	B	3	b		Does the agency's current strategic plan reference EEO / diversity and inclusion principles? If "yes", identify the EEO principles in the strategic plan in the comments column.	H.3	
					Has the agency allocated sufficient funding and qualified staffing to:		
3	B	4	a	1	Conduct a self-assessment of the agency for possible program deficiencies?	H.4	
4	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.5	
5	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.6	
6	B	4	a	9	Effectively manage its anti-harassment program?	H.7	
7	B	4	a	10	Effectively manage its reasonable accommodation program?	H.8	
					Have all managers and supervisors received training on their responsibilities regarding:		
8	B	5	a	1	The EEO Complaint Process?	H.9	
9	B	5	a	2	Reasonable Accommodation Procedures?	H.9	
10	B	5	a	3	Anti-Harassment Policy?	H.9	
11	B	5	a	4	Supervisory, managerial, communication, and interpersonal skills in order to supervise effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	H.9	
12	B	5	a	5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	H.9	
13	C	2	a	5	Are inquiries begun of all harassment allegations within 10 days of notification, including those initially raised in the EEO complaint process? What is the percentage of timely-processed inquiries?	H.10	
14	C	2	b	5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? What is the percentage of timely-processed requests?	H.11	
15	C	4	c		Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?	H.12	
16	C	4	d		Does the HR office timely provide the EEO office access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request?	H.13	
					Does the EEO office collaborate with the HR office to:		
17	C	4	e	1	Implement the Affirmative Action Plan for PWD?	H.14	
18	C	4	e	2	Develop and/or conduct outreach and recruiting initiatives?	H.15	
19	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.16	
20	C	4	e	5	Assist in preparing the MD-715 report?	H.17	
21	D	1	b		Does the agency regularly use the following sources of information for trigger identification : Workforce data, complaint/grievance data, exit surveys, focus groups, affinity groups, special emphasis programs, reasonable accommodation program, anti-harassment program, and external special interest groups?	H.18	
22	D	1	c		Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities?	H.19	
23	D	2	d		Does the agency regularly review the following sources of information to find barriers : Complaint/grievance data, exit surveys, focus groups, affinity groups, anti-harassment program, special emphasis programs, reasonable accommodation program, and external special interest groups?	H.20	
24	D	3	b		If the agency identified barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities?	H.28	
25	D	4	b		Does the agency take specific steps to ensure qualified PWD are encouraged to apply for vacancies?	H.21	
	D	4	d		Has the agency taken specific steps that are reasonably designed to increase the number of Persons with Disabilities or targeted disabilities employed at the agency until it meets the goals?	H.22	
26						Does the agency have systems in place to accurately collect, monitor, and analyze:	
27	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.23	
28	E	4	a	3	Recruiting activities?	H.24	
29	E	4	a	4	External & internal applicant flow data concerning applicants' race, national origin, sex, and disability status?	H.25	
30	E	4	a	5	The processing of requests for reasonable accommodation?	H.26	
31	E	4	a	6	The processing of complaints for the anti-harassment program?	H.27	

MD-715 - PART G Agency Self-Assessment Checklist

Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD- 715, II(A)]	Yes	The Administrator's annual EEO Policy Statement was issued on August 19, 2022.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation, and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
A.2.a	A.2 – The agency has communicated EEO policies and procedures to all employees.		
A.2.a.1	Does the agency disseminate the following policies and procedures to all employees?		
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website?		
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	No	All business contact information is posted prominently on public websites, except for contact information for GSA Special Emphasis Programs. See plan Part H.1.
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R §1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-3



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 Compliance Indicator  Measures	A.2 (CONTINUED) – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
A.2.c	Does the agency inform its employees about the following topics?:		
A.2.c.1	EEO complaint process? [see 29 CFR § 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	All employees are informed during initial onboarding, as well as via training required within 90 days of accession and biennially thereafter. Employees who are supervisors or managers also receive formal EEO training, which is required within one year of accession or assignment to those positions, and at least once every three years thereafter.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Comment for A.2.c.1 applies.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Comment for A.2.c.1 applies.
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Comment for A.2.c.1 applies.
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Employees are informed during initial onboarding and subsequently via biennial training.



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 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Complaint statistics are shared at least quarterly among Regional Administrators, and improvements and other EEO statistics are noted in the discussion.
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	



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Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION			
This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.			
 Compliance Indicator  Measures	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments
B.1.a	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission- related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	N/A	
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	September 8, 2022
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues?[see MD-715, II(B)]	Yes	



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 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)]	Yes	
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)]	Yes	
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR § 1614.102(c)(2) and (c)(3)]	N/A	GSA does not have subordinate reporting components.



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 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	No	GSA's five-year Strategic Plan (released March 2022) references both externally and internally facing Diversity, Equity, Inclusion, and Accessibility (DEIA) principles; however, it does not address EEO principles. EEO principles are included in the DEIA Strategic Plan. See plan Part H.3.



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 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	No	The anti-harassment and reasonable accommodations programs were unable to generate data needed to conduct the self-assessment in FY22. Staffing was identified as a contributing factor impacting both programs. See plan Part H.4.
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No	HR resources were not available to support barrier investigations of triggers identified in the FY20 or FY21 annual Agency EEO Program Status Report. See plan Part H.5.
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105 (b) - (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	



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 Compliance Indicator  Measures	B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR § 1614.102(c)(2)]	Yes	
B.4.a.6	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No	Applicant flow data lacks numbers of interviewed applicants. Collection of employee disability status information does not ensure accuracy of Schedule A(u) hires or address inconsistencies between disability codes, requests for reasonable accommodations, or appointments under other hiring authorities that take disability into account. Employee data management does not address instances where employee race/ethnicity data is suspected of being incorrect or inconsistencies between veterans' preference codes and veteran-related hiring authorities. See plan Part H.6.
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program (FWP), Hispanic Employment Program (HEP), and Persons with Disabilities Program (PWDP))? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	





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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.		
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), §V.C.1]	No	Effectiveness was impacted by heavy demands placed on HR personnel due to development and implementation of COVID-related return-to-work, vaccination, and religious/disability reasonable accommodation policies and procedures. See plan Part H.7.
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	No	Comment for B.4.a.9 applies. See plan Part H.8.
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	



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 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	No	At the end of FY22, two of GSA's 1,717 supervisors/managers were overdue for a training course that covers their responsibilities in all five topic areas described in measure B.5.a. Both individuals subsequently completed their overdue training in FY23. See plan Part H.9.
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	No	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	No	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	No	
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	No	
 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes	
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [see 29 CFR § 1614.102(a)(5)]	Yes	



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Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY			
This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	N/A	GSA has a centrally managed and operated civil rights program. There are no separate programs run by subcomponents.
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR § 1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	N/A	Comment for C.1.a applies. Suborganization data is generated in Table 2 and analyzed for triggers annually.
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	Comment for C.1.a applies.



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 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD- 715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Guidance on Vicarious Liability]	Yes	
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see EEOC Guidance on Vicarious Liability]	Yes	
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see EEOC Guidance on Vicarious Liability]	Yes	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	No	The anti-harassment program did not provide data in FY20, FY21, or FY22 required to assess this measure and/or calculate the percentage of timely-processed inquiries. See plan Part H.10.
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29CFR 1614.203(d)(3)]	Yes	



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 Compliance Indicator  Measures	C.2 (CONTINUED) – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.	No	Approximately 38% of FY22 requests for reasonable accommodations were not timely processed. Data was not accurate and complete enough to calculate the exact percentage of timely processed requests. See plan Part H.11.
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Yes	https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-3



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 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes	



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 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR § 1614.102(c)(2)]	Yes	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR § 1614.102(c)(2)]	Yes	



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 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	No	Not all data provided in FY20, FY21, or FY22 was accurate and/or complete. See plan Part H.12.
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	No	Complete and accurate data was not timely provided in FY20, FY21, or FY22. See plan Part H.13.



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
C.4.e	C.4 (CONTINUED) – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.		
	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities?[see 29 CFR §1614.203(d); MD-715, II(C)]	No	GSA did not collaborate in FY22 on implementation of the Affirmative Action Plan or on outreach and recruitment, trigger identification, or barrier analysis. See plan Part H.14.
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	No	Answer to C.4.e.1 applies. See plan Part H.15.
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No	Answer to C.4.e.1 applies. See plan Part H.16.
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	No	Collaboration on Part G, Part H, Part I, and Part J was insufficient to fulfill agency MD-715 obligations associated with those sections. See plan Part H.17.



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR § 1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	Zero (0)
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes	



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 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	The principal EEO official (Associate Administrator, Office of Civil Rights) provides senior leadership with a formal annual “State of the Agency” briefing covering the status and progress of the agency on efforts to meet all EEO-related obligations covered by MD-715. Additionally, various members of the Office of Civil Rights engage independently with senior leaders and program managers on matters such as environmental justice, workforce and applicant demographics, barrier analysis, and special emphasis programs, as well as DEIA matters.
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	



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Essential Element D: PROACTIVE PREVENTION			
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data, complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union/program evaluations, special emphasis programs, reasonable accommodation program, anti-harassment program, and/or external special interest groups? [see MD-715 Instructions, Sec. I]	No	Key referenced sources of information were not sufficiently timely, accurate, and complete to fully support trigger identification. See plan Part H.18.
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	No	GSA does not conduct exit surveys that contain the required questions relevant to persons with disabilities. See plan Part H.19.





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 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program, anti-harassment program, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	No	Key referenced sources of information are not sufficiently timely, accurate, and complete to fully support barrier investigations. See plan Part H.20.



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	D.3 – The agency establishes appropriate action plans to remove identified barriers.		
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	
D.3.b	If the agency identified barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	No	Barrier elimination plans reported in FY21 were not implemented and associated target dates were not met. See Part H.28
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
	D.4 – The agency has an Affirmative Action Plan for Persons with Disabilities, including those with targeted disabilities.		
	 Compliance Indicator  Measures		
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	https://www.gsa.gov/reference/civil-rights-programs/office-of-civil-rights-library
D.4.b	Does the agency take specific steps to ensure qualified Persons with Disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	No	GSA did not conduct outreach or recruitment activities in FY22 focused on recruitment and hiring of PWD or PWTD. See plan Part H.21.
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	No	GSA did not undertake applicable efforts in FY22 focused on raising participation rates of PWD or PWTD. See plan Part H.22.



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Essential Element E: EFFICIENCY			
This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	Yes	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR § 1614.105(b)(1)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	The average time to issue acceptance or dismissal decisions in FY22 was 35 days from the date of filing.
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR § 1614.102(b)(6)?	Yes	
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR § 1614.108?	Yes	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR § 1614.108(g)?	N/A	



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 Compliance Indicator  Measures	E.1 (CONTINUED) - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR § 1614.110(b)?	Yes	
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR § 1614.110(a)?	Yes	
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	In the event that any contractor provides a poor work product, revisions are requested and carefully assessed. If systematic issues arise, such as inexcusable delays in processing times, the contract could be terminated and/or key personnel could be replaced.
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	Employees are held accountable for performance objectives through GSA's performance management process, consistent with merit system principles, due process rights, GSA policies, and applicable related requirements.
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	



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 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If “yes”, please explain.	Yes	OCR has a full time, in-house attorney serving as advisor on EEO matters.
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	Comment for E.2.a applies
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch.1(IV)(D)]	N/A	Comment for E. 2.a applies
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	N/A	



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 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR § 1614.102(b)(2)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	



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 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	No	Data on race/ethnicity and disability status is not accurately collected or monitored. Data is primarily self-identified by employees; however, inaccurate employee race/ethnicity and disability status inputs are not consistently addressed. When inputs are not voluntarily provided by employees, data is generated by the agency; however, some final data entries are inconsistent with regulations and OPM guidance. See plan Part H.23.
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	No	GSA's mechanisms for compiling, monitoring, and analyzing data on recruitment activities need to be improved. See plan Part H.24.
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	No	Applicant flow data for fewer than 1% of FY22 job announcements included mandatory statistics that identified which applicants were interviewed. See plan Part H.25.



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 Compliance Indicator  Measures	E.4 (CONTINUED) – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.4.a.5	The processing of requests for reasonable accommodation? [see 29 CFR § 1614.203(d)(4)]	No	Reasonable accommodations data is insufficiently accurate and complete to calculate metrics required to answer measure C.2.b.5. The reasonable accommodation data system also lacks discretionary measures of effectiveness, such as metrics on how long it takes to provide approved accommodations, as well as data needed to correlate data triggers between the reasonable accommodations system and EEO complaints data. See plan Part H.26.
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	No	Anti-harassment program data was incomplete, and lacks data required to correlate data triggers between the harassment program and EEO complaints program. See plan Part H.27.
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	GSA has mechanisms for re-surveying race, ethnicity, and disability status; however, those processes are not effective at ensuring accurate data collection. No mechanisms are in place to address race/ethnicity coding that is believed to be inaccurate, and no mechanisms are in place to ensure correct coding of accurate disability status information for Schedule A(u) hires during their respective probationary periods.



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 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	GSA assesses and monitors its performance using the 156 Part G compliance measures, which are linked to relevant EEO laws, regulations, EEOC Management Directives, Instructions, and guidance. Many measures (e.g., processing of complaints, processing of requests for reasonable accommodations, and training compliance) use empirical data which is tracked over time to assess status, trends, and progress.
E.5.b	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	During FY22, GSA consulted with the EEOC’s Affirmative Employment Program Manager regarding potential techniques for classifying employees as individuals with disabilities when conflicts exist between self-identified disability status codes and other authorized sources of information, including data from requests for reasonable accommodations and data from appointments under hiring authorities that take disabilities into account.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	GSA consulted with the similarly sized Federal Emergency Management Agency (FEMA) and Naval Information Warfare Systems Command (NAVWAR) about MD-715 topics.





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Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE			
This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
 Compliance Indicator  Measures	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	

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 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR § 1614.502; MD-715, II(E)]	Yes	
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR § 1614.108(g)]	Yes	
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR § 1614.501]	Yes	
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR § 1614.403(e)]	Yes	
F.2.a.4	Pursuant to 29 CFR § 1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002) § 203(a)]	Yes	
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR § 1614.703(d)]	Yes	

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General Services Administration			For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements						
PART H.1						
Part G Measure:	A.2.b.1: Does the agency prominently post the following information throughout the workplace and on its public website: The business contact information for EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]?					
Brief Description of Program Deficiency:	All business contact information required under this measure is posted prominently on publicly accessible websites, except for information on GSA's Special Emphasis Program Managers.					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
03/17/22	07/29/22	06/14/23	N/A	Publicly post contact information for Special Emphasis Programs.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
07/29/22	Publicly post contact information for Special Emphasis Programs			Yes	06/14/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

Note that Part H plan H.2 does not appear in this report. Plan H.2 addressed a previously resolved deficiency, and has been closed out. The remaining plans (and numbers) reflect active plans with EEOC's Federal Sector EEO Portal tracking system.

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Plan to Attain Essential Elements						
PART H.3						
Part G Measure:	B.3.b: Does the agency's current strategic plan reference EEO/diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.					
Brief Description of Program Deficiency:	The strategic plan references diversity, equity, inclusion, and accessibility (DEIA) principles for both external-facing efforts (e.g., service delivery, customer support, and improving vendor and supplier diversity) and internal-facing efforts (e.g., hiring and performance management), but does not reference EEO principles (e.g., non-discrimination) or shared DEIA/EEO objectives (such as affirmative actions to increase participation of persons with disabilities or identification and removal of barriers to equality of opportunity).					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
5/15/21	9/30/22	9/30/26	N/A	Incorporate EEO principles into the agency strategic plan.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Director, Human Capital Policy & Programs		Daria Ingram		No		
EEO Director		Aluanda Drain		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	The Associate Administrator of Civil Rights will discuss the lack of EEO principles in GSA's strategic plan with the Chief Financial Officer and Deputy Administrator. As an interim step, the Office of Civil Rights will develop and provide relevant EEO principles to OHRM for inclusion in the GSA DEIA Strategic Plan. (Responsible Official: Aluanda Drain)			Yes	N/A	6/30/22
9/30/22	Incorporate EEO principles into relevant sections of the next revision to the agency human resources or diversity, equity, inclusion, and accessibility (DEIA) strategic plan (Responsible Official: Daria Ingram)			Yes	N/A	3/31/22
9/30/26	Incorporate EEO principles into relevant sections of the next revision to the GSA Strategic Plan (Responsible Official: Aluanda Drain)			Yes	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
2022	EEO principles were incorporated into the DEIA Strategic Plan					

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Plan to Attain Essential Elements					
PART H.4					
Part G Measure:	B.4.a.1: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]				
Brief Description of Program Deficiency:	GSA does not currently have accurate and complete reasonable accommodation and anti-harassment data required to complete the FY22 self-assessment measures C.2.a.5 or C.2.b.5. Staffing was identified in FY21 as a contributing factor impacting both programs; however, the exact root causes have yet to be determined. Data on planned and implemented Schedule A(u) employee conversions assessed in Part J, Section V.A.1 (including narrative explanations for non-conversions) was not provided in FY20, FY21, or FY22.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
10/1/21	10/31/22	10/31/23	N/A	Provide sufficient funding and qualified staffing to generate timely, accurate, and complete anti-harassment, reasonable accommodations, and Schedule A(u) conversion data necessary to assess Part G compliance measures C.2.a.5 and C.2.b.5 and Part J.	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
8/30/22	Identify all human resources data and information required to support assessment of Part G measures C.2.a.5 and C.2.b.5 and Part J, Section V.A.1.		Yes	N/A	6/1/22
10/31/23	Provide sufficient funding and qualified staffing to generate timely, accurate, and complete anti-harassment program data necessary to assess Part G compliance measure C.2.a.5 and Part J.		Yes	N/A	N/A
10/31/23	Provide sufficient funding and qualified staffing to generate timely, accurate, and complete reasonable accommodations data necessary to assess Part G compliance measure C.2.b.5 and Part J.		Yes	N/A	N/A
10/31/23	Provide sufficient funding and qualified staffing to generate timely, accurate, and complete Schedule A(u) data necessary to assess Part J.		Yes	N/A	N/A

10/31/22	Provide to the Office of Civil Rights complete and accurate data and information required to document conversions of eligible Schedule A(u) employees and reasons for non-conversions, if any.	Yes	10/31/23	N/A
10/31/22	Provide to the Office of Civil Rights complete and accurate data and information required to support assessment of Part G measures C.2.a.5 and C.2.b.5.	Yes	10/31/23	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2022	OHRM made system and processing enhancements to the case management system to improve data quality for the reasonable accommodation and anti-harassment programs.			

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Plan to Attain Essential Elements					
PART H.5					
Part G Measure:	B.4.a.2: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]				
Brief Description of Program Deficiency:	Relevant HR subject matter experts were not made available to support FY22 investigations of triggers identified and prioritized for barrier analysis in FY21.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/17/22	11/7/22	10/31/23	N/A	Provide sufficient funding and qualified staffing to successfully conduct ongoing programs of barrier investigation.	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
11/8/21	Hire program manager to oversee Diversity, Equity, Inclusion, and Accessibility policies and programs.		Yes	N/A	11/8/21
6/3/22	Based on annual prioritized triggers, identify and allocate relevant subject matter experts (SMEs) to support ongoing investigations into potential barriers associated with triggers identified as part of the MD-715 process. Commit to meetings between the Affirmative Employment Program (AEPM) Manager, DEIA Program Manager, and relevant HR SMEs, no less frequently than bi-monthly, to track status and progress, share information about activities undertaken between meetings, develop plans for future efforts, and identify new areas of subject matter expertise required.		Yes	N/A	6/30/22
6/30/22	Conduct first meeting between the AEPM, DEIA Program Manager, and relevant HR SMEs on prioritized FY21 barrier analysis topics.		Yes	N/A	6/30/22
10/31/23	Conduct regular monthly meetings between the AEPM and relevant HR SMEs to track progress toward eliminating on prioritized FY21 barrier analysis topics.		Yes	N/A	N/A
Report of Accomplishments					
Fiscal Year	Accomplishments				
2022	DEIA Program Manager was hired.				

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Plan to Attain Essential Elements		
PART H.6		
Part G Measure:	B.4.a.7: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	
	<p>GSA currently has deficiencies in both employee and applicant data (but not in complaint data); however, the reasons for the shortfalls are not clear. Along with measures E.4.a.2 and E.4.a.4 (which address systems), measure B.4.a.7 seeks to ensure that agencies are able to collect, maintain, and analyze complete and accurate employee data and applicant flow data (measure C.4.c). This Part H plan seeks first to identify relevant requirements, understand the current deficiencies, and determine the underlying factors, prior to developing corrective plans targeting resolution. As such, it is possible that measures B.4.a.7, E.4.a.2, and/or E.4.a.4 are not all deficiencies (or that all of them are). To address the unknowns, this Part H plan will holistically account for both “sufficient funding and qualified staffing” under B.4.a.7 and “systems in place to accurately collect, monitor, and analyze”... “race, national origin, sex, and disability status of agency employees”...and “external and internal applicant flow data concerning the applicants’ race, national origin, sex, and disability status” under E.4.a.2 and E.4.a.4, as well as outcomes measured by C.4.c and associated procedures and other factors (unrelated to funding, staffing, and systems) that may also impact compliance of required outcomes. Specific identified data-related issues include:</p> <ol style="list-style-type: none"> (1) Interview statistics are not captured within applicant flow data for all announcements (2) Collection of employee disability status information does not ensure accurate disability coding of Schedule A(u) hires (3) Workforce data management does not address inconsistencies between elements <i>within</i> the employee data system of record, including (a) disability status codes, (b) data from appointments through hiring authorities that take disability into account (including Schedule A(u) and others), and (c) veterans’ preference codes (4) Workforce data management does not address inconsistencies between (a) disability status codes within the system of record and (b) data from requests for reasonable accommodations (maintained outside the HR Links system of record) 	

Brief Description of Program Deficiency:	<p>(5) Workforce data management does not address instances where employee race/ethnicity data is suspected of being incorrectly self-identified during initial onboarding or subsequent re-survey efforts</p> <p>(6) Agency-designated employee race/ethnicity data may not be entirely correct</p> <p>(7) Applicant flow data does not include complete information for applicants hired through direct hire authorities and/or applicants hired to senior executive positions</p> <p>(8) Employee data does not accurately characterize the temporary/permanent status of all employees</p> <p>(9) Career development data does not include information on mentoring programs or detail opportunities</p>					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
3/16/22	9/30/23	6/28/24	N/A	Attain and maintain required workforce and applicant data. Improve workforce and applicant data where required. Further implement discretionary improvements to employee data where practicable, in accordance with 29 CFR § 1614.203(d)(6)(ii) and consistent with applicable OPM regulations.		
Responsible Official(s)						
Title			Name		Plan is in Performance Standards?	
Chief Human Capital Officer			Traci DiMartini		No	
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/23	Identify potential mechanisms, timeframes, and resource requirements (e.g., staffing, training, funding, data systems/software, procedures, etc.) necessary to address data-related corrections and/or improvements in each of the following areas (some issues may require engagement with OPM for guidance):			Yes	N/A	N/A
9/30/22	a. How GSA can capture statistics on interviewed applicants within agency applicant flow data, in accordance with EEOC MD-715 and the EEOC's Instructions to Federal Agencies for MD-715.			Yes	6/28/24	N/A
9/30/23	b. How GSA can capture and maintain accurate disability codes within the HR Links system of record for all <u>Schedule A(u)</u> employees.			Yes	N/A	N/A

9/30/23	c. How GSA can capture and maintain accurate disability codes <u>within the HR Links system of record</u> , based on information from appointments under hiring authorities that take disabilities into account (other than <u>Schedule A(u)</u>).	Yes	N/A	N/A
9/30/23	d. How GSA can (or should) change disability status code information <u>within the HR Links system of record</u> .	Yes	N/A	N/A
9/30/22	e. How GSA can improve disability status codes within the <u>reasonable accommodations data system</u> .	Yes	9/29/23	N/A
9/30/23	f. Engage with OPM and EEOC to determine if veterans' preference codes (VPCs) may be used to classify employees as PWD (i.e., in addition to hiring authorities that take disability into account (including those that confer eligibility due to status as a disabled veteran) and/or data from requests for reasonable accommodations).	Yes	N/A	N/A
3/30/23	g. Develop methods to ensure agency engagement with employees (per 29 CFR § 1614.601(b)) to capture accurate race/ethnicity information: i. In situations where employees do not voluntarily provide race/ethnicity information ii. In situations where employees self-identify as <u>all</u> race/ethnicity options (i.e., Hispanic or Latino, White, Black or African American, Asian, Native Hawaiian or Other Pacific Islander, and American Indian or Alaska Native)	Yes	6/28/24	N/A
9/30/23	h. Identify methods to add metadata elements to the system of record for race/national origin/ethnicity data and disability status data. Specifically, for each of those elements, it is desirable to add metadata fields that capture when the data was last updated, and whether the data was generated through employee self-identification or through designation by the agency.	Yes	N/A	N/A

9/30/23	<p>i. Develop and execute plans to conduct annual resurvey efforts for both disability status information and race/ethnicity data. Expand communications to broaden response rates. Target specific groups for additional re-survey efforts (i.e., through focused email notifications and other specific efforts), as warranted by analysis of employee data, including, but not limited to:</p> <ul style="list-style-type: none"> i. Veterans (more than 1,000 disabled veterans have not self-identified as having a disability within the HR Links system of record) ii. Hispanics (this demographic group falls short of expected participation rates, particularly in higher grade levels) iii. Individuals who have been federal employees for five or more years (statistics show a reverse correlation between length of employment and rates of self-identification as a person with disabilities) 	Yes	N/A	N/A
9/30/23	<p>j. Develop and implement mechanisms for capturing relevant data on mentoring programs. Initial information may be in the form of decentralized mentoring programs (i.e., for specific SSOs (e.g., PBS) and/or functional areas (e.g., acquisition).</p>	Yes	N/A	N/A
9/30/23	<p>k. Develop and implement mechanisms for capturing relevant data on details. Initial information may be in the form of key data from the GSA Opportunity Network, including data necessary to crosswalk applicant and selectee information to more detailed data in the employee system of record.</p>	Yes	N/A	N/A
Report of Accomplishments				
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Plan to Attain Essential Elements				
PART H.7				
Part G Measure:	B.4.a.9: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			
Brief Description of Program Deficiency:	Along with measure E.4.a.6 (which addresses systems), measure B.4.a.9 seeks to ensure effective resourcing and management of anti-harassment programs, as demonstrated by (a) timely conducting inquiries into harassment allegations (including those raised during the EEO complaint process) (measure C.2.a.5), (b) providing data to support the annual self-assessment (measure B.4.a.1), (c) providing data to support identification of triggers (measure D.1.b), and (d) providing data to support barrier analysis (measure D.2.b). From FY20 thru FY22, GSA was unable to assess the timeliness of harassment inquiries because complete harassment data was unavailable for analysis. Absent relevant data, GSA was also unable to complete the annual assessment or conduct effective trigger identification or barrier investigations. Staffing resources and system limitations were both cited in FY21 as contributing factors; however, the exact reasons for the shortfalls are not clear. Thus, this Part H plan seeks first to identify relevant requirements, understand the current deficiencies, and determine the underlying factors, prior to developing corrective plans targeting resolution. As such, it is possible that measure B.4.a.9 is not deficient. To address the unknowns, this Part H plan will holistically account for both “sufficient funding and qualified staffing” under B.4.a.9 and “effective and accurate systems in place to evaluate”... “the processing of complaints for the anti-harassment program” under E.4.a.6, as well as associated procedures and other factors (i.e., unrelated to funding, staffing, and systems) that may also impact compliance of required outcomes.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
3/16/22	9/30/22	10/31/23	N/A	Attain and maintain accurate anti-harassment program data. Provide sufficient funding, qualified staffing, and effective, accurate systems to enable timely processing of inquiries (and other time-constrained milestones identified in the GSA anti-harassment procedures) and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses.

Responsible Official(s)				
Title	Name	Plan is in Performance Standards?		
Chief Human Capital Officer	Traci DiMartini	No		
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	<p>Develop a comprehensive list of all allegations of harassment reported to GSA during FY21, FY22, and FY23, including, at a minimum, the data elements listed below.</p> <ol style="list-style-type: none"> 1. For each person allegedly (including former employees) harassed, the following data elements from the HR Links system of record: <ol style="list-style-type: none"> a. Race/ethnicity code (<u>6-digit binary</u>) b. Sex/gender c. Disability status code d. Veterans' preference code e. Appointment authority f. Supervisor race/ethnicity/sex g. Whether the allegation was raised during the EEO process, and if so, a unique identifier, sufficient to identify the corresponding case within the EEO complaint system h. Whether the employee separated during the year, and if so, on what date i. Pay plan, grade level, and series j. Additional information, as necessary to support barrier analysis (e.g., reasons for untimely inquiries, if any) 2. For each alleged harasser the following data elements from the HR Links system of record:: <ol style="list-style-type: none"> a. Race/ethnicity code (6-digit binary) b. Sex/gender c. Disability status code d. Veterans' preference code e. Appointment authority 3. Description of alleged behavior (e.g., threats, racial or ethnic jokes, bullying, slurs) 4. Whether the alleged behavior involved: <ol style="list-style-type: none"> a. Alleged harassee's supervisor or supervisory chain b. Race c. Sex/gender d. Disability e. Bullying, intimidation, or threatening behavior f. Age g. Retaliation 5. Dates when the following milestone events occurred: <ol style="list-style-type: none"> a. Initial date that any GSA official (e.g., supervisor, manager, or local Anti-Harassment Coordinator (AHC)) was first informed or made aware of the harassing conduct b. Date preliminary inquiry was initiated c. Date preliminary inquiry was completed d. Date local AHC was notified (and name of AHC) 	Yes	10/31/23	N/A

	<p>e. For cases initially raised during the EEO complaints process, the date that the Anti-Harassment program was notified of the case by the EEO program.</p> <p>6. For each allegation of harassment, identify if the individual alleging harassment has:</p> <p>a. Alleged harassment previously. Identify HR case numbers of all other such allegations of harassment made during the current and previous fiscal year.</p> <p>b. Requested reasonable accommodations. Identify HR case numbers of all other such requests made during the current and previous fiscal year.</p> <p>Provide the information beginning with FY23 by 10/30/2023. Provide one-year data for each future fiscal year MD-715 reporting cycle (including FY23) within one month of the end of the fiscal year (by October 31) to support annual assessment, trigger identification, and barrier analysis.</p>			
9/30/22	Identify staffing, procedures, training, funding, systems, software and/or other resource deficiencies, if any, that prevent development and maintenance of the data described above.	Yes	9/29/23	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2022	The Office of Human Resources Management made system and processing enhancements to the case management system to improve data quality for the anti-harassment program.			
2022	The Office of Civil Rights improved its procedures for notifying the Anti-Harassment Program of harassment allegations raised in the EEO complaint process.			

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Plan to Attain Essential Elements					
PART H.8					
Part G Measure:	B.4.a.10: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]				
Brief Description of Program Deficiency:	<p>Along with measure E.4.a.5 (which addresses systems), measure B.4.a.10 seeks to ensure effective resourcing and management of reasonable accommodation programs, as demonstrated by (a) timely processing of requests for reasonable accommodations (measure C.2.b.5), (b) providing data to support the annual self-assessment (measure B.4.a.1), (c) providing data to support identification of triggers (measure D.1.b), and (d) providing data to support barrier analysis (measure D.2.b). Since FY20, GSA has untimely processed roughly 35% of requests. Additionally, program data was insufficiently complete and accurate to support the Part G compliance assessment, trigger identification, barrier analysis, or tracking of completion of Part H corrective plans. Staffing resources were identified in FY20 and FY21 as contributing factors and certain system limitations are known; however, the exact reasons for the ineffective outcomes are not clear. Thus, this Part H plan seeks first to identify relevant requirements, understand the current deficiencies, and determine the underlying factors, prior to developing corrective plans targeting resolution. To address the unknowns, this Part H plan will holistically account for both “sufficient funding and qualified staffing” under B.4.a.10 and “effective and accurate systems in place to evaluate”... “the processing of requests for reasonable accommodations” under E.4.a.5, as well as associated procedures and other factors (i.e., unrelated to funding, staffing, and systems) that may also impact compliance of required outcomes.</p>				
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/22	9/29/23	N/A	<p>Improve the reasonable accommodations program. Provide sufficient funding, qualified staffing, and an effective, accurate data system to enable consistently timely processing of requests for reasonable accommodations and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses. Improve the reasonable accommodations data system by adding relevant measures of effectiveness identified in MD-715 Part J.</p>	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
EEO Director		Aluanda Drain		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	Research all requests for reasonable accommodation that were untimely processed in FY20, FY21, and FY22, in order to identify root causes and contributing factors, and develop and implement appropriate corrective and preventative measures	Yes	9/29/23	N/A
9/30/22	The National Reasonable Accommodation Program Manager will (a) improve data accuracy and completeness, (b) flag requests that are approaching established deadlines (i.e., before they become non-compliant) and requests that have exceeded established processing requirements, (c) automate calculations, (d) support trigger identification, (e) support barrier analysis, and (f) identify timeframes for implementation of approved accommodations. Collaborate with the AEPM to support (a) the MD-715 Part G assessment, (b) trigger identification, and (c) barrier analysis.	Yes	9/29/23	N/A
9/29/23	For each requestor (including former employees), provide the following data elements from the HR Links system of record: a. Race/ethnicity code (<u>6-digit binary</u>) b. Sex/gender c. Disability status code d. Veterans' preference code e. Appointment authority f. Supervisor race/ethnicity/sex g. Whether the employee separated during the year, and if so, on what date h. Pay plan, grade level, and series i. Additional data elements required to support barrier analysis (e.g., bases for denials, reasons for untimely processing)	Yes	N/A	N/A
9/30/23	Make relevant changes to reasonable accommodations processing procedures to elevate visibility of requests that are approaching or have exceeded the established deadline, with goals of providing enhanced oversight, reducing processing times, identifying and tracking root causes for processing delays, and enabling iterative improvements through tracking of lessons learned and application of best practices	Yes	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2022	OHRM made enhancements to the case management system to improve reasonable accommodations data.			

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Plan to Attain Essential Elements						
PART H.9						
Part G Measure:		<p>Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:</p> <ul style="list-style-type: none"> • B.5.a.1: EEO Complaint Process? [see MD-715(II)(B)] • B.5.a.2: Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)] • B.5.a.3: Anti-Harassment Policy? [see MD-715(II)(B)] • B.5.a.4: Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)] • B.5.a.5: Alternative dispute resolution (ADR), with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)] 				
Brief Description of Program Deficiency:		At the end of FY22, two of GSA's supervisors/managers were overdue for a training course that covers their responsibilities in all five topic areas described above. Both individuals subsequently completed the training course in FY23. Existing mechanisms that rely on notification of supervisors of pending non-compliance and overdue training are ineffective in ensuring compliance and preventing reportable deficiencies.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
2/28/23	7/10/23	N/A	N/A	Ensure all supervisors attain and maintain compliance with relevant training requirements		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
7/10/23	Ensure all supervisors attain and maintain compliance with relevant training requirements			Yes	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

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Plan to Attain Essential Elements				
PART H.10				
Part G Measure:	C.2.a.5: <ul style="list-style-type: none"> Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column. 			
Brief Description of Program Deficiency:	GSA was unable to calculate the percentage of timely-processed inquiries because complete anti-harassment program data was incomplete. See plan Part H.7.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
3/16/22	9/30/22	10/31/23	N/A	Improve the anti-harassment program. Provide sufficient funding, qualified staffing, and effective, accurate systems to enable consistently timely processing of inquiries (and other time-constrained milestones identified in the GSA anti-harassment procedures) and to provide accurate and complete data required to support annual assessments (including calculation and reporting of the percentage of timely-processed inquiries), trigger identification, and barrier analyses.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
9/30/22	Resolution of this potential deficiency is addressed in Part H plan H.7			Yes
				10/31/23
				N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2022	OHRM made system enhancements to add harassment cases to the HR case management system.			

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Plan to Attain Essential Elements				
PART H.11				
Part G Measure:	C.2.b.5: <ul style="list-style-type: none"> Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD- 715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column. 			
Brief Description of Program Deficiency:	GSA did not process reasonable accommodation requests within the timeframe set forth in its reasonable accommodation procedures. Program data was also incomplete and inaccurate, and therefore could not be used to calculate the percentage of timely-processed requests required by this measure, adversely affecting completion of the assessment. It also could not be used to support trigger identification, barrier analysis, or tracking progress of Part H corrective plans. See plan Part H.8.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
5/17/21	9/30/21	9/29/23	N/A	Improve the reasonable accommodations program. Provide sufficient funding, qualified staffing, and an effective, accurate data system to enable consistently timely processing of requests for reasonable accommodations and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
9/30/22	Resolution of this deficiency is addressed in Part H plan H.8			Yes
				9/29/23
				N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			

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PART H.12				
Part G Measure:		C.4.c: Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]		
Brief Description of Program Deficiency:		Workforce demographic data is not fully accurate. Applicant flow data is incomplete. Career development data made progress in FY21 and FY22 but was insufficient in FY22 to fully complete the Part J data tables. See plan Part H.6.		
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
3/16/22	9/30/23	6/28/24	N/A	Attain and maintain required workforce and applicant data. Improve workforce and applicant data where required. Further improve employee data where practicable, in accordance with 29 CFR § 1614.203(d)(6)(ii) and consistent with applicable OPM regulations.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified
9/30/22	Resolution of this deficiency is addressed in plan Part H.6		Yes	6/28/24
Report of Accomplishments				
Fiscal Year	Accomplishments			

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PART H.13					
Part G Measure:	C.4.d: Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]				
Brief Description of Program Deficiency:	Complete and accurate data was not timely provided in FY22 on (a) exit interviews, (b) grievances, (c) allegations of harassment, or (d) requests for reasonable accommodations.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
4/7/22	9/30/22	9/29/23	N/A	Develop methods to ensure timely, complete, and accurate data from "other sources" (i.e., other than workforce, applicant, and career development data) to support MD-715 requirements. This Part H plan focuses on resolution of deficiencies associated with grievance data only. Exit survey shortfalls are addressed by plan Part H.19. Deficiencies associated with reasonable accommodations are addressed by plan Part H.8. Deficiencies associated with anti-harassment are addressed by plan Part H.7. No grievance data was provided for FY20. Grievance data for FY21 and FY22 was not timely provided and lacked data elements necessary to support trigger identification and barrier analysis.	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
EEO Director		Aluanda Drain		Yes	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	Grievance program manager and AEPM will collaborate to identify MD-715 data requirements associated with grievance data. Grievance program manager will update the grievance data system to capture required data.		Yes	9/29/23	N/A
Report of Accomplishments					
Fiscal Year	Accomplishments				
2022	OHRM improved grievance data provided to support MD-715 analyses.				

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Plan to Attain Essential Elements						
PART H.14						
Part G Measure:	C.4.e.1: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to: Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]					
Brief Description of Program Deficiency:	In FY21 and FY22, the HR office and EEO office did not collaborate sufficiently on implementation of the Affirmative Action Plan or development or execution of PWD/PWTD or other outreach/recruitment initiatives. Plan Part H.16 addresses HR and EEO collaboration on trigger identification and barrier analysis.					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/12/22	7/29/22	9/29/24	N/A	Develop and implement regular collaborative meetings and objectives relating to each of the four major focus areas of the Affirmative Action Plan (AAP) for Persons with Disabilities (PWD) (i.e., (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD), as well as collaborative meetings to coordinate efforts with HR recruitment programs (e.g., Federal Equal Opportunity Recruitment Program (FEORP), Selective Placement Program (SPP), and Disabled Veterans Affirmative Action Program (DVAAP)).		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
EEO Director		Aluanda Drain		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	Identify relevant HR subject matter experts (SMEs) for each of the four AAP focus areas and establish regular monthly meetings for each of the four AAP focus areas between the HR SMEs, PWD Special Emphasis Program Co-Managers (SEPMs), DEIA Program Manager, and the Affirmative Employment Program Manager to collaborate on generating plans; identifying resources/requirements; tracking progress toward attainment of AAP requirements and goals; and fulfilling MD-715, FEORP, and DVAAP reporting requirements. Convene initial meetings between the SMEs, PWD SEPMs, DEIA PM and AEPM no later than 5/26/2023. As initial topics, include discussion of agency PWD and PWTD participation rates, federal and agency goals, triggers, and trends; AAP contents; MD-715 reporting requirements; and relevant topics within each individual focus area. See examples on the next page.			Yes	9/29/24	N/A

	<p>For example:</p> <ul style="list-style-type: none"> • The recruitment focus area group should address specific steps the agency can take to ensure qualified PWD are aware of and encouraged to apply for GSA job vacancies; AAP questions related to recruitment; communicating the agency's PWD and PWTD participation goals to hiring managers and recruiters; and improved communications and tracking regarding use of the Department of Labor's Workforce Recruitment Program (WRP). • The hiring focus area should include training of hiring managers on use of hiring authorities that take disability into account (including Schedule A(u), Veterans Recruitment Appointment (VRA) authority, Veterans Employment Opportunity Act (VEOA) authority, 30% or More Disabled Veteran authority); mechanisms for improving use of those authorities; and AAP questions related to hiring. • The advancement focus area should include procedures for encouraging participation of PWD/PWTD in career development programs, tracking/management of probationary Schedule A(u) employees, tracking of PWD/PWTD applications and participation in advancement-related programs described in Section IV of Part J (including Individual Development Plans), as well as AAP questions/tables related to advancement. • The retention focus area group should address proactive management of Schedule A(u) hires throughout their probationary periods, conversion of Schedule A(u) employees, improving the exit survey to add required questions regarding PWD, potential improvements to the accuracy of disability status codes, and enhanced tracking and reporting of PWD/PWTD participation rates and their trends throughout the employment life cycle, as well as AAP questions/tables related to retention. 			
6/30/22	Establish and conduct meetings, no less than quarterly, between the AEPM, FEORP Manager, SPP Coordinator, and DVAAP Manager to coordinate program activities; review plans, status, and progress; and to identify areas of potential collaboration.	Yes	9/29/23	N/A
7/29/22	Establish agency participation goals for PWD and persons with targeted disabilities (PWTD). Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTD within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTD).	Yes	N/A	8/9/22
9/29/23	Develop and implement communications to inform hiring managers and recruiters of the new numerical goals.	Yes	N/A	N/A
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PART H.15				
Part G Measure:	C.4.e.2: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to develop and/or conduct outreach and recruiting initiatives? [see MD- 715, II(C)]			
Brief Description of Program Deficiency:	In FY21 and FY22, the HR office and EEO office did not sufficiently collaborate on outreach/recruitment.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
1/12/22	6/30/22	9/29/23	N/A	Develop and implement regular collaborative meetings and objectives relating to recruitment under the Affirmative Action Plan for Persons with Disabilities and collaborative meetings to coordinate efforts of the Federal Equal Opportunity Recruitment Program, Selective Placement Program, and Disabled Veterans Affirmative Action Program.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
6/30/22	This deficiency is addressed under plan Part H.14			Yes
				9/29/23
				N/A
Report of Accomplishments				
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PART H.16						
Part G Measure:	C.4.e.4: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to identify and remove barriers to equal opportunity in the workplace?					
Brief Description of Program Deficiency:	In FY21 and FY22, the HR office and the EEO office did not collaborate sufficiently on barrier analysis.					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/12/22	6/30/22	9/29/23	N/A	Develop and implement regular collaborative meetings between relevant HR SMEs and the AEPM to enable systematic, ongoing progress to be made toward identifying triggers and investigating those triggers to identify and eliminate EEO barriers to equal employment opportunity.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	Identify relevant HR subject matter experts (SMEs) for each prioritized trigger identified during the previous annual MD-715 reporting cycle and subsequent mid-year analyses. Establish regular meetings between the HR SMEs, relevant SEPMs, the DEIA PM, and the AEPM, no less than monthly for each barrier identified, to generate and execute barrier analysis plans, discuss findings, and track and document progress attained between meetings. As barrier investigations begin to conclude within a particular trigger area, identify relevant HR SMEs associated with the next highest barrier analysis priority, and adjust HR SMEs (and SEPM composition) accordingly, to ensure effective, ongoing barrier analyses.			Yes	9/29/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

EEOC FORM 715-02 PART H		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT				
General Services Administration			For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements						
PART H.17						
Part G Measure:		C.4.e.5: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to assist in preparing the MD-715 report? [see MD-715, II(C)]				
Brief Description of Program Deficiency:		HR office and EEO office collaboration on Part G, Part H, Part I, and Part J was insufficient in FY20, FY21, and FY22 to fulfill agency MD-715 reporting obligations associated with those sections.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
4/12/22	10/31/22	10/31/23	N/A	Achieve and maintain HR office and EEO office collaboration in all aspects of the MD-715 reporting process, including providing information and data to develop Parts A thru J and the MD-715 data tables.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
EEO Director		Aluanda Drain		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	Generate a comprehensive list of all HR-related inputs required to comply with annual MD-715 reporting requirements, including both standard annual obligations, as well as unique deliverables associated with current Part H, Part I, and Part J focus areas. Provide that list to the CHCO. Aside from that comprehensive list (as well as data/information requests stemming from (a) annual compliance assessments, (b) ongoing barrier analysis activities, and (c) regular HR/EEO collaboration meetings), coordinate off-cycle/ad hoc data requests through designated HR points of contact. (Responsible Official: EEO Director)			Yes	N/A	6/30/22
10/31/22	Address individual deficiencies identified within this MD-715 Part H independently, in accordance with their respective target dates. Separately, use the list provided by the EEO Director (above) to develop, compile, and provide all HR-related inputs to the MD-715 report to the AEPM by October 31 each year (i.e., within one month of the end of the fiscal year). (Responsible Official: CHCO)			Yes	10/31/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

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Plan to Attain Essential Elements						
PART H.18						
Part G Measure:		D.1.b: Does the agency regularly use the following sources of information for trigger identification: workforce data, complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union/program evaluations, special emphasis programs, reasonable accommodation program data, anti-harassment program data, and/or information from external special interest groups? [see MD-715 Instructions, Sec. I]				
Brief Description of Program Deficiency:		Key referenced sources of information were insufficient or provided too late to support trigger identification.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/15/22	10/30/22	6/28/24	N/A	Obtain timely, complete, and accurate information to support annual efforts to identify triggers		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
10/30/22	Resolution of this deficiency is addressed in other Part H corrective plans targeting individual deficiencies relating to each of the various other sources of information (e.g., plan Part H.6 addresses workforce data, plan Part H.7 addresses harassment data, plan Part H.8 addresses reasonable accommodations data, and plan Part H.19 addresses exit survey data), as well as in overarching Part H plans that comprehensively address MD-715 reporting requirements (e.g., plan Part H.17)			Yes	6/28/24	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

EEOC FORM 715-02 PART H		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT				
General Services Administration		For period covering October 1, 2021 to September 30, 2022				
Plan to Attain Essential Elements						
PART H.19						
Part G Measure:	D.1.c: Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]					
Brief Description of Program Deficiency:	GSA does not conduct surveys that contain questions on how the agency could improve, hiring, inclusion, retention, and advance of individuals with disabilities.					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
10/1/18	7/1/19	9/30/23	N/A	Conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
7/1/19	Develop exit survey questions that address all requirements in EEOC's revised Part G assessment checklist.			Yes	9/30/21	5/24/21
9/30/21	OHRM to review proposed exit survey questions, incorporate them into the GSA Exit Survey, and disseminate the new survey (e.g., update links, etc.). To be accomplished via a new platform contract to be in place by FY23.			Yes	9/30/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

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General Services Administration			For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements						
PART H.20						
Part G Measure:		D.2.d: Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program data, special emphasis program data, reasonable accommodation program data, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.				
Brief Description of Program Deficiency:		Key referenced sources of information were insufficient or provided too late to support barrier investigations.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/15/22	10/30/22	10/31/23	N/A	Obtain timely, complete, and accurate information to support ongoing efforts to investigate, identify, and eliminate barriers		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
10/30/22	Resolution of this deficiency is addressed through other Part H corrective plans that independently target resolution of individual deficiencies relating to each of the various sources of information (e.g., plan Part H.7 addresses harassment data, plan Part H.8 addresses reasonable accommodations data, and plan Part H.19 addresses exit survey data). In addition, plan Part H.16 addresses collaboration between HR and EEO offices to identify and remove barriers and plan Part H.17 addresses comprehensive data requirements to support MD-715 reporting requirements.			Yes	10/31/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

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General Services Administration		For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements					
PART H.21					
Part G Measure:	D.4.b: Does the agency take specific steps to ensure qualified Persons with Disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]				
Brief Description of Program Deficiency:	GSA did not conduct outreach or recruitment activities in FY22 focused on recruitment and hiring of PWD or PWTD.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
1/12/22	7/29/22	9/29/23	N/A	Take specific steps to ensure qualified PWD/PWTD are aware of and are encouraged to apply for job vacancies.	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
7/29/22	Resolution of this deficiency is addressed in plan Part H.14		Yes	9/29/23	N/A
Report of Accomplishments					
Fiscal Year	Accomplishments				

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Plan to Attain Essential Elements						
PART H.22						
Part G Measure:		D.4.d: Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]				
Brief Description of Program Deficiency:		GSA did not undertake efforts in FY22 focused on raising participation rates of PWD or PWTD.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/12/22	7/29/22	9/29/23	N/A	Establish and communicate agency-specific participation goals for PWD and PWTD. Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTD within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTD).		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
7/29/22	Resolution of this deficiency is addressed in plan Part H.14			Yes	9/29/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
2022	GSA set new goals of 18% for PWD and 3% for PWTD.					

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General Services Administration			For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements						
PART H.23						
Part G Measure:		E.4.a.2: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]				
Brief Description of Program Deficiency:		<p>Data on race/ethnicity and disability status is not accurately collected or monitored. Data is primarily self-identified by employees; however, inaccurate employee race/ethnicity and disability status inputs are not consistently addressed. When inputs are not voluntarily provided by employees, data is generated by the agency; however, some employee data (which might have been self-identified and/or agency-designated) is inconsistent with regulations and OPM guidance. There is currently no way to identify whether race/ethnicity or disability data was generated by an employee or the agency (or when data entries were entered or last modified).</p> <p>Agency coding of disability status does not incorporate data from reasonable accommodation requests or appointments under special hiring authorities for individuals with disabilities. The employee data system (HR Links) does not address inconsistencies between data elements (e.g., disability status codes (employee or agency-generated), data from appointments under hiring authorities that take disabilities into account, and veterans' preference codes), or external data from requests for reasonable accommodations.</p>				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
3/16/22	9/30/23	6/28/24	N/A	Attain and maintain required employee data. Improve collection and monitoring of workforce data as required. Further improve employee data where practicable, in accordance with 29 CFR § 1614.203(d)(6)(ii) and consistent with applicable OPM regulations.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
N/A	Resolution of this deficiency is addressed in plan Part H.6			Yes	6/28/24	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

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General Services Administration		For period covering October 1, 2021 to September 30, 2022		
Plan to Attain Essential Elements				
PART H.24				
Part G Measure:		E.4.a.3: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: Recruitment activities? [see MD-715, II(E)]		
Brief Description of Program Deficiency:		GSA has no data collection system to facilitate compiling, monitoring, or analyzing data on recruiting activities.		
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
4/18/22	9/30/23	9/30/24	N/A	Develop, implement, and maintain a tracking system for recruitment activities to permit analyses of these efforts to support examination of potential barriers to equality of opportunity
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
8/31/22	Hold collaborative meeting(s) between GSA National Recruitment Center, AEPM, DEIA PM, and SEPMs for the PWD SEP, Hispanic Employment Program, and Federal Women's Program to identify relevant recruitment-related data elements necessary to support barrier analysis, effective recruitment program oversight, and requirements of the AAP, SPP, FEORP, and DVAAP.			Yes
9/30/24	Develop and implement solution to accurately collect, monitor, and analyze data on recruitment activities.			TBD
Report of Accomplishments				
Fiscal Year	Accomplishments			

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Plan to Attain Essential Elements				
PART H.25				
Part G Measure:		E.4.a.4: External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]		
Brief Description of Program Deficiency:		Applicant flow data for fewer than 1% of FY22 job announcements included mandatory statistics that identified which applicants were interviewed, in addition to required data that identified which applicants were qualified, referred, and/or selected.		
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
3/16/22	9/30/23	6/28/24	N/A	Develop, implement, and maintain an accurate data collection system that includes all mandatory applicant flow data, including interview statistics.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
9/30/23	This deficiency is addressed in plan Part H-6			Yes
				6/28/24
				N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			

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General Services Administration		For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements					
PART H.26					
Part G Measure:	E.4.a.5: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The processing of requests for reasonable accommodation? [see 29 CFR § 1614.203(d)(4)]				
Brief Description of Program Deficiency:	Reasonable accommodations data is insufficiently accurate and complete to calculate metrics required by measure C.2.b.5. Data is missing, preventing accurate calculation of compliance metrics and effective monitoring and oversight of processing timeliness. The reasonable accommodation data system also lacks relevant discretionary measures of effectiveness, such as metrics on how long it takes to provide accommodations, once requests are approved.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/22	9/29/23	N/A	Improve the reasonable accommodations data system.	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	Resolution of this deficiency is addressed in plan Part H.8		Yes	9/29/23	N/A
Report of Accomplishments					
Fiscal Year	Accomplishments				
2022	OHRM made improvements to the case management system to improve the accuracy of reasonable accommodations data.				

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General Services Administration		For period covering October 1, 2021 to September 30, 2022		
Plan to Attain Essential Elements				
PART H.27				
Part G Measure:	E.4.a.6: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]			
Brief Description of Program Deficiency:	Complete anti-harassment program data was not available in FY20, FY21, or FY22 for analysis.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
3/16/22	9/30/22	10/31/23	N/A	Improve the anti-harassment program.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
9/30/22	Resolution of this deficiency is addressed in plan Part H.7			Yes
				10/31/23
				N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2022	OHRM made improvements to the case management system to allow incorporation of harassment cases.			

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General Services Administration			For period covering October 1, 2021 to September 30, 2022			
Plan to Attain Essential Elements						
PART H.28						
Part G Measure:		D.3.b: If the agency identified barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]				
Brief Description of Program Deficiency:		Barrier elimination plans reported in FY21 were not implemented and associated target dates were not met.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
5/31/22	9/29/23	N/A	N/A	Address the barriers reported in FY21, including untimely processing of reasonable accommodations and implementation of the AAP for PWD.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
9/29/23	Resolution of this deficiency is addressed in plan Part H.8 and H.14			Yes	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

Part I – EEO Plans to Eliminate Identified Barriers

EEOC FORM 715-02 PART I		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
General Services Administration			For period covering October 1, 2021 to September 30, 2022		
PART I.1					
Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)					
Source of the Trigger:		MD-715 data tables			
Specific Workforce Data Table:		Table A-4			
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?		Hispanic Males and Hispanic Females both exhibit lower than expected participation in General Schedule (GS) grade levels GS-12 and higher			
<i>BARRIER GROUPS:</i>		Hispanic Males and Hispanic Females			
Analysis Completed?		No			
Barrier(s) Identified?		No			
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Barrier Name		Description of Policy, Procedure, or Practice	
		None identified.		No barrier has yet been identified.	
Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.
Responsible Official(s)					
Title			Name		Plan is in Performance Standards?
N/A			N/A		N/A
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified Date Completed
N/A	N/A			N/A	N/A N/A
Report of Accomplishments					
Fiscal Year	Accomplishments				
	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY22 barrier analysis efforts.				

PART I.1 - Continued

Barrier Analysis Process

Sources of Data	Source Reviewed?	Information Collected
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY17 through FY22
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18 through FY22.
Grievance Data	Yes	Grievance data is still being analyzed.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	Yes	Anti-harassment data is still being analyzed.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA FEVS results from 2015 through 2022; OPM Government-wide Management Report – 2021 and 2022 FEVS Results
Exit Interview Data	No	Exit interview was not available to support analyses.
Focus Groups	No	
Interviews	Yes	Information about workforce trends and demographic focus areas relevant to multiple individual GSA regions, offices, and programs.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Federal Workforce Report for 2019 (released 2022); EEOC report on Workers with Disabilities in the Federal Workforce; Bureau of Labor Statistics reports on labor force characteristics, by race/ethnicity, education, and citizenship; Pew Research Center – Who is Hispanic, September 15, 2022; MSPB Report – Achieving a Representative Federal Workforce Addressing the Barriers to Hispanic Participation (undated)
Other - Career Development Program Data	Yes	Data for CDPs from FY19 thru FY22
Other - Special Emphasis Program (SEP) Information	Yes	Meetings with Hispanic Employment Program Special Emphasis Program Managers to identify triggers and areas of interest for barrier investigations.

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PART I.2						
Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)						
Source of the Trigger:		MD-715 data tables and applicant flow data				
Specific Workforce Data Table:		Table A-6				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?		Selection/hire rates for White Females to GS13, GS14, and GS15 merit promotions to series 0201, 0301, 0343, 1101, 1102, and 2210 are much higher than their participation rates within best qualified pools. Conversely, Hispanic or Latino Males, Hispanic or Latino Females, Black or African American Males, and Black or African American Females all have selection rates far below their respective rates within the corresponding best qualified eligibility pools.				
BARRIER GROUPS:		Hispanic or Latino Males and Hispanic or Latino Females, Black or African American Males, and Black or African American Females				
Analysis Completed?		No				
Barrier(s) Identified?		No				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Barrier Name		Description of Policy, Procedure, or Practice		
		None identified.		No barrier has yet been identified.		
Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.	
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
N/A		N/A		N/A		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
N/A	N/A			N/A	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY22 barrier analysis efforts.					

PART I.2 - Continued

Barrier Analysis Process

Sources of Data	Source Reviewed?	Information Collected
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY17 through FY22.
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18 thru FY22.
Grievance Data	Yes	Grievance data for FY22 is being reviewed.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	Yes	Anti-harassment data for FY21 and FY22 is being reviewed.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA FEVS results from 2015 thru 2020.
Exit Interview Data	No	Exit interview/survey data was not available at the time that analyses were being conducted.
Focus Groups	No	
Interviews	No	GSA does not currently capture, maintain, or analyze data on interviewed applicants.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	MSPB Research Brief, Direct Hire Authority Under 5 U.S.C. § 3304: Usage and Outcomes, February 2021; GAO Report to Congressional Committees, Federal Hiring – OPM Needs to Improve Management and Oversight of Hiring Authorities, August 2016; OPM Memo on Implementing Regulation for Government-wide Direct-Hire Authority for Certain Federal Acquisition Positions, August 5, 2005; OCHCO bulletins; MSPB Report to the President and Congress, Merit System Principles: Guiding the Fair and Effective Management of the Federal workforce, September 26, 2016; MSPB Report – Merit System Principles – Keys to Managing the Federal Workforce, October, 2020.
Other – GSA Order HRM 9332.2, June 9, 2022	Yes	Information on direct hire authority for STEM occupations
Other - Career Development Program Data	Yes	Data for Competitive Development Programs (CDPs) from FY19 thru FY22.
Other - Special Emphasis Program (SEP) Information	Yes	Meetings with Special Emphasis Programs and affinity groups to identify triggers and areas of interest for barrier investigations.

MD-715 – Part J

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes," describe the trigger(s) in the text box.

- | | | |
|--------------------------------|-----|--------------------------|
| a. Cluster GS-1 to GS-10 (PWD) | Yes | <input type="radio"/> No |
| b. Cluster GS-11 to SES (PWD) | Yes | <input type="radio"/> No |

Answer: GSA is fully compliant in this measure.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes," describe the trigger(s) in the text box.

- | | | |
|---------------------------------|-----|--------------------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes | <input type="radio"/> No |
| c. Cluster GS-11 to SES (PWTD) | Yes | <input type="radio"/> No |

Answer: GSA is fully compliant in this measure.

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

Answer: GSA has not communicated the agency's numerical participation goals for PWD and PWTD to hiring managers as part of the staffing/hiring strategic

conversation. In FY23, OHRM plans to include this information in the job analysis that is presented during the strategic conversation.

Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must ensure sufficient staff, training, and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Yes

No

Answer: Key programs and activities were unable to effectively support the disability program in FY22, in part due to insufficient qualified staffing and in part to prioritization of other efforts related to COVID-19 procedures (e.g., vaccinations, return-to-work) and/or DEIA program initiatives. Two OHRM program managers were subsequently hired in FY22 to jointly support DEIA and MD-715 efforts (one of whom also serves as SPPC, DVAAP Manager, and FEORP Manager); however, resources were insufficient in FY22 to effectively support efforts to recruit, hire, advance, or retain PWD and PWTD. The agency did not take specific steps in FY21 or FY22 to implement relevant aspects of the GSA Affirmative Action Plan for PWD (e.g., recruitment, hiring, advancement, or retention of PWD). Schedule A(u) hires are not currently managed to ensure correct disability status records or to track conversion of eligible candidates after completion of their respective two-year probationary periods. The agency is currently unable to coordinate use of either (1) data from appointment authorities that take disability into account or (2) data from requests for reasonable accommodations to correct inaccurate disability status information. Schedule A(u) hires are able to self-identify incorrect disability status codes. Improvements to these identified shortfalls are addressed in multiple Part H corrective plans.

2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

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Disability Program Task	Number of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD			1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Answering questions from the public about hiring authorities that take disability into account			1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Section 508 Compliance			23	Chuck Popelka/Daniel Perkins Section 508 Deputy/Program Manager charles.popelka@gsa.gov dan.perkins@gsa.gov
Architectural Barriers Act Compliance			12	Michael Foegelle National Accessibility Officer michael.foegelle@gsa.gov
Special Emphasis Program for PWD and PWTD			3	John Bagwell & Hayden Shock, Co-SEPMs john.bagwell@gsa.gov hayden.shock@gsa.gov
Processing reasonable accommodation requests from applicants and employees	20			Emily Claybrook Reasonable Accommodation Coordinator emily.plank@gsa.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Yes No

Answer: All staff members with disability-related responsibilities are required to receive annual training within their respective specialties (e.g., Human Resources, Information Technology, Facilities Management); however, training and/or resources may be insufficient, as evidenced by deficiencies identified in Part G of this report and further described in Part H. Improvements related to this potential shortfall are addressed in multiple Part H corrective plans.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Yes No

Answer: Funding and/or other resources may be insufficient, as evidenced by deficiencies identified in Part G of this report and further described in Part H. Improvements related to this potential shortfall are addressed in multiple Part H corrective plans.

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, specifically including persons with targeted disabilities.

Answer: GSA utilizes OPM's Shared Register of Candidates with Disabilities and the Workforce Recruitment Program (WRP); however, there were no agency-level efforts conducted in FY22 targeting recruitment of either PWD or PWTD. Additionally, the agency uses the USAJOBS hiring path for Individuals with Disabilities to identify positions that are open to candidates who identify as such. The application process allows the applicant to self-identify as a person who is eligible for hire under a special hiring authority and to name the special hiring authority specifically. GSA's Selective Placement Program coordinator (SPPC) helps the agency recruit, hire, and accommodate people with disabilities. The SPPC also provides guidance through the application process and answers questions.

2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

Answer: There were no agency-level efforts conducted in FY22 targeting recruitment of PWD or PWTD. Schedule A(u) appointment authority and other hiring authorities that take disability into account are included as hiring mechanisms in job announcements; however, they are widely not used as targeted recruitment tool. The agency's Merit Promotion announcements specifically include the USAJOBS Hiring Path for "Individuals With Disabilities" to identify that the vacancy is open to those who meet that criteria. Where applicable and when such a selection is made, the Schedule A(u) hiring authority is cited for the hire. The agency also utilizes the Department of Labor's WRP to supplement our entry level hiring efforts.

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3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A(u)), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Answer: Applicants who apply under Schedule A(u) via USAJOBS have eligibility determined via the same evaluation process as other candidates; however, they are placed on a separate certificate for hiring managers' consideration. The agency advises applicants in vacancy announcements of the documentation requirements for claiming eligibility under special hiring authorities (including Schedule A(u)). When applications are reviewed by human resources specialists, eligibility determinations are made on the basis of the supporting documentation which may include a disability letter from a doctor or a licensed medical professional that proves their eligibility for Schedule A(u) appointment. Once eligibility is determined, the candidate is also reviewed for meeting qualification requirements. An eligible, qualified Schedule A(u) applicant is referred on the non-competitive merit promotion referral list to management for review with other candidates.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Yes

No

N/A

Answer: Managers and supervisors are required take initial and recurring training courses, some of which touch on topics relating to Schedule A(u); however, not all hiring managers were compliant with the training requirements, and the coverage of this topic in the curriculum is limited. Effectiveness of that training may be insufficient, as evidenced by issues relating to onboarding data that appears inaccurate and/or inconsistent with regulations. Further investigations into these issues, as well as planned improvements, are addressed in multiple Part H corrective plans.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

Answer: The GSA National Recruitment Center maintains regularly updated lists of candidate sourcing options that include PWD-focused groups and organizations (identified

by both region or occupation) as well as PWD-focused contacts within schools and universities (e.g., disability services directors, disability resource directors, and disability support offices).

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

- | | | |
|---|-----|-------------------------------------|
| a. New Hires for Permanent Workforce (PWD) | Yes | <input checked="" type="radio"/> No |
| b. New Hires for Permanent Workforce (PWTD) | Yes | <input checked="" type="radio"/> No |

Answer: No triggers exist in this measurement area.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

- | | | |
|----------------------------|--------------------------------------|----|
| a. New Hires for MCO (PWD) | <input checked="" type="radio"/> Yes | No |
|----------------------------|--------------------------------------|----|

Answer: The following mission critical occupational series have lower participation of PWD among new hires, compared to the participation rate among qualified applicants: 0501, 0905, 1170, and 2210.

- | | | |
|-----------------------------|--------------------------------------|----|
| b. New Hires for MCO (PWTD) | <input checked="" type="radio"/> Yes | No |
|-----------------------------|--------------------------------------|----|

Answer: The following mission critical occupational series have lower participation of PWTD among new hires, compared to the participation rate among qualified applicants: 0201, 0343, 0501, 0905, 1102, and 1170.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

- | | | |
|---------------------------------------|-----|-------------------------------------|
| a. Qualified Applicants for MCO (PWD) | Yes | <input checked="" type="radio"/> No |
|---------------------------------------|-----|-------------------------------------|

Answer: No triggers exist in this measurement area. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification.

b. Qualified Applicants for MCO (PWTD) Yes No

Answer: The mission critical occupational series 0501 has lower participation rates of PWTD among qualified applicants, compared to participation rates among the relevant applicant pool. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

a. Promotions for MCO (PWD) Yes No

Answer: The mission critical occupational series 0343, 1101, and 1102 have lower participation rates of PWD among promoted employees, compared to their participation rates among qualified applicants. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification.

b. Promotions for MCO (PWTD) Yes No

Answer: The mission critical occupational series 0343, 1101, and 1102 lower participation rates of PWTD among promoted employees, compared to their participation rates among qualified applicants. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification (13% for mission critical occupations).

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

Answer: GSA provides career development opportunities for all eligible employees (not just PWD) through various Competitive Development Programs (CDPs). To develop the mandatory MD-715 data tables, those 27 CDPs are consolidated by grade level eligibility into the seven categories tracked by MD-715 (e.g., GS-13, GS-14, GS-15, and SES; as well as Supervisors, Managers, and Executives). That analysis showed high nomination rates (relative to eligibility pools) and high selection rates (relative to nomination pools) for both PWD and PWTD. Improving advancement opportunities for PWD is being addressed within plan Part H.14 and other Part H corrective plans. GSA does not currently track statistics on opportunities associated with either details or mentoring programs. In FY23, GSA plans to begin capturing basic data related to the GSA Opportunity Network, a developmental program that offers a variety of temporary opportunities to GSA's workforce, including (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less, as well as data on mentoring programs offered by particular GSA Services or Staff Offices and/or related to specific functional communities (e.g., acquisition program management).

B. CAREER DEVELOPMENT OPPORTUNITIES

1. Please describe the career development opportunities that the agency provides to its employees.

Answer: GSA provides career development opportunities for all eligible employees (not just PWD) through various CDPs. The specific CDPs vary from year to year (with 6 offered in FY19, 7 offered in FY20, 11 offered in FY21, and 27 offered in FY22). The FY22 CDPs included multiple grade-specific courses from 8 major sources, including (1) eCornell (Leadership Essentials and Intrapreneurship), (2) Eisenhower School National Defense University, (3) Federal Executive Institute (FEI) Leadership for a Democratic Society, (4) Graduate School USA (Executive Leadership Program and Executive Potential Program), (5) Harvard Kennedy School (Senior Executive Fellows Program), (6) OPM (President's Management Council Interagency Rotation Program), (7) Partnership for Public Service (Foundations in Public Service Leadership Program, Excellence in Government Fellows Program, Leadership Excellence in Acquisition Program, and Preparing to Lead Program),

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and (8) White House Leadership Development Program. The programs have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development. In addition to the agency-level CDPs, GSA also maintains the following other offerings: (1) GSA Start Program, (2) Targeted Leadership Development Program, (3) Mentoring Program, (4) Coaching services, and (5) Enterprise Emerging Leaders Program. GSA's Mentoring Program and various sub-component mentoring programs establish professional relationships in which an experienced person (the mentor) supports and encourages employees to develop specific skills and knowledge that will maximize their business potential and improve their performance. The program includes a Resource Library, virtual training through GSA's Online University, self-assessments, tips, templates, and videos. In addition to managing the agency-level program, the Mentoring Program also helps subordinate organizations to create Mentoring Pilots, connects employees with Regional Mentoring Programs, and provides Mentoring Essentials training for new employees. Additionally, GSA's Phased Retirement Guidelines and Procedures (HRM 9900.1) contain a requirement for a phased retiree to spend at least 20 percent of his/her working hours mentoring. The Enterprise Emerging Leaders Program (EELP) is a two-year development program that provides entry level talent (recently hired GS7-GS9 employees on a career ladder promotion track to GS12) with rotational opportunities, core technical and professional leadership training, and mentoring to ensure that new hires gain the knowledge, skills, and abilities required to successfully perform in mission critical positions across the agency. The program gives employees a strong foundation for their careers, making them well-rounded employees, capable of serving the agency in a wide range of offices. The purpose of the EELP is to provide the necessary training, experiences, and support to selected entry level employees so that, upon completion of the program, they are prepared for permanent placement in a GSA office. The GSA Start Program is an enterprise-wide developmental training curriculum for new, entry-level employees in grades GS7 through GS11 and in various occupational series. The virtual, one-year training provides new employees with professional development training focused on core competencies and offers additional learning opportunities. The GSA Start Program supports new employees in building foundational GSA business knowledge, essential professional skills, and developing relationships during the training and beyond. Core competencies include Communication Skills, Conflict Management, Continual Learning, Influencing-Negotiating, Integrity-Honesty, Interpersonal Skills, Problem Solving, Public Service Motivation, and Team Building. At the individual level, every GSA employee is afforded the opportunity to complete Individual Development Plans (IDPs), which are guides to help employees reach career goals within the context of organizational objectives. IDPs are developmental

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"action" plans to move employees from where they are to where they want to be, and to provide the systematic steps to improve in areas that are not strengths and to build on strengths as individuals improve job performance and pursue career goals. IDPs serve many potential objectives, including learning new skills and competencies to improve current job performance; maximizing current performance in support of organizational requirements; assisting employees in reaching career development goals; increasing interest, challenge, and satisfaction in current positions; and/or obtaining knowledge, skills, and abilities necessary for a change in grade level (i.e., promotion), occupational series, or fields. IDPs require supervisor approval and may require higher-level authorization. While not a competitive program or directly associated with career development, GSA also maintains a comprehensive Leadership Development Framework derived from OPM Executive Core Qualifications (ECQs) that allows employees to focus on leadership competencies throughout the various stages of their careers, in preparation for future opportunities. That Framework identifies 28 leadership competencies, divided into five ECQs: (1) Leading Change, (2) Leading People, (3) Results Driven, (4) Business Acumen, and (5) Building Coalitions; along with the Fundamental Competencies of Integrity/Honesty, Interpersonal Skills, Written Communication, Oral Communication, Continual Learning, and Public Service Motivation. Furthermore, the Framework is divided into five major roles, each aligned to particular grade levels, including: (1) Leading Self – Team Member (GS13 and below), (2) Leading Teams – Supervisor (GS13-GS14), (3) Leading Organizations – Manager (GS14-GS15), (4) Leading Strategy – Executive (SES), and (5) Fundamental Programs (all GSA employees).

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (#)	Selectees (#)	Applicants (#)	Selectees (#)
Other Career Development Programs	188	57	39	13	8	3
Training Programs	0	0	0	0	0	0
Internship Programs	1479	117	64	9	39	4
Fellowship Programs	54	24	11	6	3	3
Mentoring Programs	Mentoring program is not centrally managed. No data available.					
Coaching Programs	Coaching does not require competition or supervisor approval.					
Detail Programs	Detail programs are not centrally managed. No data available.					

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3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees). If “yes”, describe the trigger(s) in the text box.

- | | | |
|---------------------|-----|-------------------------------------|
| a. Applicants (PWD) | Yes | <input checked="" type="radio"/> No |
| b. Selections (PWD) | Yes | <input checked="" type="radio"/> No |

Answer: The 27 FY22 CDPs were consolidated into the seven categories used in the mandatory MD-715 data tables, then assessed for triggers using that framework. Additionally, triggers were analyzed using eligibility pools, nomination rates, and selection rates within each individual course offering in each grade level. That latter analysis provides more detailed results; however, due to very small populations of selectees for each grade-specific CDP, triggers are more prevalent than when analyzed using aggregate data; however, those arithmetic triggers are more a function of the benchmarking than discriminatory practices. Looking instead at consolidated statistics (covering all 27 CDPs), both PWD and PWTD have both overall nomination rates and overall selection rates that are higher than expected (i.e., favorable, compared to rates in relevant eligibility pools and nominee pools, respectively). For example, PWD comprise 19.6% of employees eligible for the CDPs, 20.7% of nominees to the CDPs, and 23.5% of selectees.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- | | | |
|----------------------|-----|-------------------------------------|
| a. Applicants (PWTD) | Yes | <input checked="" type="radio"/> No |
| b. Selections (PWTD) | Yes | <input checked="" type="radio"/> No |

Answer: The 27 FY22 CDPs were consolidated into the seven categories used in the mandatory MD-715 data tables, then assessed for triggers using that framework. Additionally, triggers were analyzed using eligibility pools, nomination rates, and selection rates within each individual course offering in each grade level. That latter analysis provides more detailed results; however, due to very small populations of selectees for each grade-specific CDP, triggers are more prevalent than when analyzed using aggregate data; however, those arithmetic triggers are more a function of the benchmarking than discriminatory practices. Looking instead at consolidated statistics (covering all 27 CDPs), both PWD and PWTD have both overall nomination rates and overall selection rates that are higher than expected (i.e.,

favorable, compared to rates in relevant eligibility pools and nominee pools, respectively). For example, PWTD comprise 2.7% of employees eligible for the CDPs, 4.6% of nominees to the CDPs, and 7.4% of selectees.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|---|--------------------------------------|--------------------------|
| a. Awards, Bonuses, & Incentives (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Awards, Bonuses, & Incentives (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: There are triggers for PWD in time-off awards between 11 hours and 40 hours and triggers for PWTD in time-off awards between 1 and 30 hours. With respect to cash awards, there are triggers of both PWD and PWTD in all categories, except \$500 and under for PWD and \$1000-\$1999 for both PWD and PWTD.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|-------------------------|--------------------------------------|--------------------------|
| a. Pay Increases (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Pay Increases (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: There is a trigger for PWD, who received Quality Step Increases (QSI) at a rate of 0.46%, compared to the QSI rate of 1.23% for persons without disabilities, and a trigger for PWTD, who received QSI at a rate of 0.26%.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- | | | | |
|--------------------------------------|---------------------------|--------------------------|--------------------------------------|
| a. Other Types of Recognition (PWD) | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| b. Other Types of Recognition (PWTD) | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |

Answer: Data on other types of recognition is not currently available.

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES		
i. Qualified Internal Applicants (PWD)	Yes	<input checked="" type="radio"/> No
ii. Internal Selections (PWD)	Yes	<input checked="" type="radio"/> No
b. GS-15		
i. Qualified Internal Applicants (PWD)	Yes	<input checked="" type="radio"/> No
ii. Internal Selections (PWD)	<input checked="" type="radio"/> Yes	No
c. GS-14		
i. Qualified Internal Applicants (PWD)	Yes	<input checked="" type="radio"/> No
ii. Internal Selections (PWD)	<input checked="" type="radio"/> Yes	No
d. GS-13		
i. Qualified Internal Applicants (PWD)	Yes	<input checked="" type="radio"/> No
ii. Internal Selections (PWD)	<input checked="" type="radio"/> Yes	No

Answer: For SES, there was no data provided in FY22 relating to internal selections. This issue was previously identified as a data shortfall by the EEOC in their September 30, 2021 feedback on GSA’s FY20 MD-715 report submission. For GS-15, there were zero selections among seven PWD. For GS-14, the rate of PWD among Internal Selections was 40%, compared to a rate of 58% among Qualified Internal Applicants. For GS-13, the rate of PWD among Internal Selections was 61%, compared to a rate of 73% among Qualified Internal Applicants. Note: Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the

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approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- | | | | |
|---|----------------------------------|-----------------------|----------------------------------|
| a. SES | | | |
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> | <input checked="" type="radio"/> |
| ii. Internal Selections (PWTD) | Yes | <input type="radio"/> | <input checked="" type="radio"/> |
| b. GS-15 | | | |
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> | <input checked="" type="radio"/> |
| ii. Internal Selections (PWTD) | <input checked="" type="radio"/> | <input type="radio"/> | No |
| c. GS-14 | | | |
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> | <input checked="" type="radio"/> |
| ii. Internal Selections (PWTD) | <input checked="" type="radio"/> | <input type="radio"/> | No |
| d. GS-13 | | | |
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> | <input checked="" type="radio"/> |
| ii. Internal Selections (PWTD) | <input checked="" type="radio"/> | <input type="radio"/> | No |

Answer: For SES, there was no data provided in FY22 on internal selections. For GS-15, there was only one PWTD Qualified Internal Applicant and zero selected. For GS-14, the participation rate of PWTD among Qualified Internal Applicants was 27%; however, the rate among Internal Selections was only 13%. For GS-13, the rate of PWTD among Internal Selections was 28%, compared to a rate of 33% among Qualified Internal Applicants. Note: Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- | | | | |
|-----------------------------|----------------------------------|-----------------------|----------------------------------|
| a. New Hires to SES (PWD) | Yes | <input type="radio"/> | <input checked="" type="radio"/> |
| b. New Hires to GS-15 (PWD) | <input checked="" type="radio"/> | <input type="radio"/> | No |
| c. New Hires to GS-14 (PWD) | <input checked="" type="radio"/> | <input type="radio"/> | No |
| d. New Hires to GS-13 (PWD) | <input checked="" type="radio"/> | <input type="radio"/> | No |

Answer: For SES, there was no applicant flow data provided for new hires in FY22. This

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issue was previously identified as a data shortfall by EEOC in their feedback on GSA's FY20 MD-715 report submission. For GS-15, there were 2 PWD selections among 358 qualified applicants from 56 announcements. For GS-14, there were 5 PWD selections among 509 qualified applicants from 122 announcements. For GS-13, there were 12 PWD selections among 733 qualified applicants from 223 announcements. Note: Trigger identification in this area was negatively impacted by a very low rate of applicant self-identification of disability status.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- | | | |
|------------------------------|--------------------------------------|--------------------------|
| a. New Hires to SES (PWTD) | Yes | <input type="radio"/> No |
| b. New Hires to GS-15 (PWTD) | Yes | <input type="radio"/> No |
| c. New Hires to GS-14 (PWTD) | Yes | <input type="radio"/> No |
| d. New Hires to GS-13 (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: For SES, there was no applicant flow data provided for new hires in FY22. For GS-13, there were 6 PWTD selections among 344 qualified applicants from 223 announcements. Note: Trigger identification in this area was negatively impacted by a very low rate of applicant self-identification of disability status.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- | | | |
|--|--------------------------------------|--------------------------|
| a. Executives | | |
| i. Qualified Internal Applicants (PWD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Managers | | |
| i. Qualified Internal Applicants (PWD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

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c. Supervisors

- | | | |
|--|--------------------------------------|--------------------------|
| i. Qualified Internal Applicants (PWD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWD) | <input checked="" type="radio"/> Yes | No |

Answer: Trigger identification in this area was negatively impacted by an exceptionally low rate of applicant self-identification of disability status. For Executives, of 256 Qualified Internal Applicants, 9 identified their disability status, and of those, 7 (78%) were PWD; however, none were selected. For Managers, 52 (out of 772) Qualified Internal Applicants identified disability status, and of those, 30 (58%) identified as PWD; however, of the 15 selectees who identified their disability status, only 6 PWD (40%) were selected. For Supervisors, out of 732 Qualified Internal Applicants, 78 identified disability status and 57 (73%) identified as PWD; however, of the 18 selectees who identified their disability status, only 11 (61%) were PWD.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- | | | |
|---|--------------------------------------|--------------------------|
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTD) | <input checked="" type="radio"/> Yes | No |

b. Managers

- | | | |
|---|--------------------------------------|--------------------------|
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTD) | <input checked="" type="radio"/> Yes | No |

c. Supervisors

- | | | |
|---|--------------------------------------|--------------------------|
| i. Qualified Internal Applicants (PWTD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTD) | <input checked="" type="radio"/> Yes | No |

Answer: Trigger identification in this area was negatively impacted by an exceptionally low rate of applicant self-identification of disability status. For Executives, of 256 Qualified Internal Applicants, 9 identified their disability status, and of those, 1 was PWTD; however, zero were selected. For Managers, of 772 Qualified Internal Applicants, 52 identified their disability status, of whom 14 (27%) were PWTD. Among selectees, 15 identified their disability status, of whom 2 (13%) were PWTD. For

Supervisors, of 732 Qualified Internal Applicants, 78 identified their disability status, of whom 26 (33%) were PWTD; however, of 18 Qualified Internal Applicants (out of 178) who identified disability status, 5 (28%) identified as PWTD.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box

- | | | |
|-----------------------------------|--------------------------------------|--------------------------|
| a. New Hires to Executives (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. New Hires to Managers (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| c. New Hires to Supervisors (PWD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: For Executives, only 8% of the Qualified Applicant Pool self-identified disability information, of whom 72% identified as PWD; however, among selectees, only 50% were PWD. For Managers, only 8% of the Qualified Applicant Pool self-identified disability information, of whom 74% identified as PWD; however, among selectees, only 63% were PWD. For Supervisors, 9% of the Qualified Applicant Pool self-identified disability information, of whom 72% identified as PWD; however, among selectees who self-identified disability information, only 55% were PWD.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box

- | | | |
|------------------------------------|--------------------------------------|-------------------------------------|
| a. New Hires to Executives (PWTD) | <input type="radio"/> Yes | <input checked="" type="radio"/> No |
| b. New Hires to Managers (PWTD) | <input type="radio"/> Yes | <input checked="" type="radio"/> No |
| c. New Hires to Supervisors (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: For Supervisors, 7% of the Qualified Applicant Pool self-identified disability information, of whom 33% identified as PWTD; however, among selectees who self-identified disability information, only 27% were PWTD.

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities, (2) describe efforts to ensure accessibility of technology and facilities, and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A(u) employees with a disability into the competitive service after two years of satisfactory service (5 CFR § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A(u) employees.

Yes No

Answer: All eligible Schedule A(u) employees have not been converted, because GSA has not been tracking or managing Schedule A(u) hires or their conversions. At the end of FY22, GSA had 231 employees with Schedule A(u) appointment codes. Of those, 44 Schedule A(u) hires had been employed by GSA for between 2.2⁶⁸ years and 37.3 years, but had not yet been converted to the competitive service. Overall, eligible Schedule A(u) employees who remained in the excepted service beyond 2.2 years (at the end of FY22) have been employed by the GSA for an average of eight years. Performance was not a factor relating to non-conversions, as ratings were assessed in FY21, when all non-converted Schedule A(u) employees were found to have received satisfactory (or better) performance ratings. An additional 49 Schedule A(u) employees will be at least two years past their respective latest appointment dates at the end of FY23. In FY22, OHRM conducted an analysis of how conversions are being handled and identified several factors contributing to untimely conversions. In FY23, OHRM launched efforts (1) to determine if identified employees meet the requirements to be converted, (2) to convert eligible employees (beginning with the most recently eligible employees), and (3) to implement reminders to notify managers so that timely conversion can occur.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)	<input checked="" type="radio"/> Yes	No
b. Involuntary Separations (PWD)	<input checked="" type="radio"/> Yes	No

Answer: Among Voluntary Separations, People without Disabilities (PWOD) had an Inclusion Rate (IR) of 8.8 percent; however, PWD had an inclusion rate of 9.4 percent.

⁶⁸ Initial analysis efforts provided an additional 2 months (0.2 years) to account for time associated with potential pending conversions, after completion of the 2-year probation period. This was intended to ensure that the number of non-converted eligible Schedule A(u) employees was not overestimated.

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Among Involuntary Separations, PWoD had an IR of 0.29 percent; however, PWD had an IR of 0.46 percent.

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- | | | |
|-----------------------------------|--------------------------------------|--------------------------|
| a. Voluntary Separations (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Involuntary Separations (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: Among Voluntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 8.8 percent; however, PWTD had an inclusion rate of 9.0 percent. Among Involuntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 0.29 percent; however, PWTD had an inclusion rate of 0.77 percent.

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Answer: GSA does not conduct exit interviews and does not use an exit survey that includes questions on how the agency can improve recruitment, hiring, advancement, inclusion, or retention of PWD or PWTD. Some subcomponents use exit surveys and/or an independent exit interview process; however, the results of those efforts are not centrally managed or reported to the GSA Central Office for compiling and reporting. Plan Part H.19 addresses resolution of the deficient exit survey language.

In addition to evaluating exit survey results, GSA also planned in FY22 to obtain a more complete picture of potential reasons for employee separations by correlating relevant data between systems; however, data relating to reasonable accommodations and allegations of harassment was incomplete, and did not include requested data elements necessary to correlate statistics with EEO complaints and employee separation data.

Analysis of requests for reasonable accommodations for FY20, FY21, and FY22 identified significant differences between the processing time for requests that were (a) approved or (b) approved with modification, and those requests that were (c) denied. GSA policy and procedures for providing reasonable accommodations (GSA Order HRM 2300.1 of December 14, 2021) require approved reasonable accommodations to be provided as soon as possible, but not to exceed 30 calendar days from receipt of requests (not including time required to obtain medical documentation, if necessary).

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During FY20, reasonable accommodations approvals and approvals with modification both took an average of 37 days; however, denials took an average of 70 days for a decision to be reached.

In FY21, approved requests were processed in an average of 18 days (although 25% of approved requests took longer than 30 days). Requests that were approved with modification averaged 41 days, while denied requests took an average of 60 days for a decision to be reached. Because of the changes in the FY21 employment environment due to COVID, FY21 reasonable accommodations data was believed to be atypical (e.g., FY21 saw only half the request volume of FY20), so the analysis was expanded to also include FY20 data.

In FY22, the volume of requests for accommodation expanded by 500% from FY21 levels, with high numbers of requests relating to COVID-19 vaccination exemptions and telework. Trends in the processing time for approvals, approvals with modification, and denials remained, with approvals taking an average of 24 days for a decision to be reached, approvals with modification taking 29 days, and denials taking 43 days. Additionally, 10 requests that were in “pending” status at the end of FY22 averaged 165 days in processing as of September 30, 2022. Critically, GSA does not currently track how long it takes to provide accommodations, once approved.

In FY22 there were three complaints filed with both removal as an issue and disability as a basis and six complaints filed for disability-related reasonable accommodation, as well as four settlements relating to disability and reasonable accommodations and one settlement relating to removal and disability.

In FY21 there was one complaint filed with both removal as an issue and disability as a basis and one for disability-related reasonable accommodation, as well as six settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability).

In FY20 there was one complaint filed with both removal as an issue and disability as a basis and eleven complaints filed for disability-related reasonable accommodation, as well as four settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability).

In FY19 there were four complaints filed with both removal as an issue and disability as a basis and eight for disability-related reasonable accommodation, as well as one

settlement relating to disability and reasonable accommodations (but no settlements relating to removal and disability).

In FY18 there were no complaints filed with both removal as an issue and disability as a basis, but there were twelve filed for disability-related reasonable accommodation, as well as eight settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability).

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

Answer: Information on rights associated with Section 508 of the Rehabilitation Act is at <https://www.gsa.gov/policy-regulations/policy/information-integrity-and-access/it-accessibilitysection-508>. Information on how to file a Section 508 complaint is available (to employees only) via the internal GSA-only website (<https://insite.gsa.gov/employee-resources/information-technology/508-accessibility/how-to-file-a-508-complaint>) and can be accessed by applicants at www.gsa.gov by searching for the term "508."⁶⁹

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

Answer: Information on rights associated with the Architectural Barriers Act (ABA) is on the public site <https://www.gsa.gov/real-estate/design-construction/accessible-facility-design>, which includes a link to the GSA Accessibility Desk Guide and information on how to file ABA complaints through the U.S. Access Board via their publicly accessible online

⁶⁹ GSA Section 508 Complaint Procedure is publicly accessible at: [https://www.gsa.gov/cdnstatic/GSA%20508%20Complaint%20Procedures%20\(1\).pdf?_ga=2.17261177.1502383566.1677700064-1441148810.1663683102](https://www.gsa.gov/cdnstatic/GSA%20508%20Complaint%20Procedures%20(1).pdf?_ga=2.17261177.1502383566.1677700064-1441148810.1663683102)

complaint form (<https://www.access-board.gov/enforcement/>).

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

Answer: GSA is committed to making Federal buildings and facilities fully accessible to all people, and achieving accessibility is reflected in GSA's commitment to excellence in design, development, and construction. GSA is dedicated to meeting or exceeding Federal, state, and local accessibility standards and to ensuring the full integration of individuals with disabilities who use our facilities. Because GSA's facilities are flexible and adaptable, providing employees and visitors with disabilities the opportunity to take part in all the programs, services, and activities our buildings are designed to support is an attainable goal. In FY22, GSA's Public Buildings Service assessed the state of the design and construction industry in the areas of diversity, equity, inclusion, and accessibility and met with contractors and designers to identify successes, challenges, and how GSA can help the industry evolve together. In April, 2022, the GSA PWD Special Emphasis Program hosted a presentation by the GSA National Accessibility Program Manager and disseminated a link to the Accessibility Desk Guide and information about accessibility in the GSAbility News publication. GSA is also addressing physical accessibility by aligning the GSA DEIA Strategic Plan with the Executive Order 14035 through the National Accessibility Program.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period.

Answer: As of September 30, 2022, the average processing time for requests for reasonable accommodations in FY22 was approximately 31 days; however, that figure is subject to change. GSA policy and procedures are designed to provide reasonable accommodations as soon as possible, but not to exceed 30 calendar days from receipt of the request, unless extenuating circumstances exist. The system tracks the processing time from the date of the request to the date that a decision is reached; however, when medical documentation is required, the 30-day time limit is held in abeyance between the

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dates that medical documentation is requested and received. In some cases, employees do not timely provide requested medical documentation, so the system lacks a receipt date and is unable to calculate the processing time until a Local Reasonable Accommodations Coordinator (LRAC) manually updates the case information. At the end of FY22, several requests were awaiting medical documentation. Once medical documentation is received and/or the LRACs manually update the system to account for cases when medical documentation was requested by not provided, case-specific processing times will change, as will the overall average processing time.

TABLE 14: Processing Times for Requests for Reasonable Disability Accommodations

FY	Average Time (Days) for:				Percent Timely Processed (100% is required)
	Approvals	Approvals with Modification	Denials	All Decisions	
2020	37	37	70	50	64%
2021	18	41	60	25	70%
2022	24	29	43	31	62%

Of 414 requests, 256 (62%) were timely processed and 158 (38%) were untimely processed. Approved requests took an average of 24 days (although 115 approved requests (35%) took longer than 30 days to process). Requests that were approved with modification averaged 29 days (although 7 approved requests (54%) took longer than 30 days to process). Denied requests took an average of 43 days for a decision to be reached and 47% of denied requests took longer than 30 days to process. All figures reflect total days-in-process, minus all time between when medical documentation was requested and received, as of the end of FY22. FY22 processing performance was less favorable than FY21, which averaged 25 days; however, the overall number of requests in FY22 (414) far exceeded the number of FY21 cases (80), due in large part to the high volume of FY22 requests relating to COVID vaccination exemptions and telework.

- Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

Answer: Over the past four years, (1) approximately 35% of requests for reasonable accommodations have been untimely processed; (2) many requests have been very untimely, taking well beyond 30 days (even after properly accounting for time required to

obtain medical documentation); and (3) data on reasonable accommodations has consistently been incomplete and/or inaccurate. The current reasonable accommodation data system does not track additional metrics of effectiveness, such as timeliness of providing approved accommodations. Planned improvements to the reasonable accommodations program are addressed in plan Part H.8.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

Answer: GSA had no requests for personal assistance services in FY22.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Yes No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Yes No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

Answer: No complaints alleging harassment resulted in findings. Three complaints alleging harassment based on disability status resulted in settlements.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Yes No

2. During the last fiscal year, did any complaints alleging failure to provide a reasonable accommodation result in a finding of discrimination or a settlement agreement?

Yes No

3. If the agency had one or more findings of discrimination involving failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Answer: No complaints alleging failure to provide a reasonable accommodation resulted in findings. Four complaints alleging reasonable accommodation as an issue resulted in settlements.

Section VII: Identification and Removal of Barriers

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Yes No

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

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Answer:

(1) Barriers Identified in FY21:

- a. Untimely processing of reasonable accommodations for the past four years was identified in FY21 as a barrier to PWD. Objectives, planned activities, and the relevant responsible official with authority and control over GSA's reasonable accommodations program are described in plan Part H.8.
- b. Insufficient implementation of the Affirmative Action Plan for PWD was identified as an overarching barrier affecting many different factors relating to recruitment, hiring, advancement, and retention of PWD. Similarly, shortfalls in execution and coordination of the DVAAP and SPP also directly affect opportunities for PWD. Objectives, planned activities, and the relevant responsible official are described in plan Part H.14.
- c. Several additional triggers were investigated in FY21 and FY22 as potential barriers, including, but not limited to (a) untimely conversions of eligible (non-probationary) Schedule A(u) hires, (b) low rates of nomination and/or application of PWD to career development programs, and (c) relatively high utilization of direct hiring authority AYM. Plan Part H.14 and other Part H corrective plans address all Part G deficiencies related to employment of PWD and PWTD.

(2) Barriers Identified in FY22:

- a. Untimely conversion of eligible Schedule A(u) hires was confirmed in FY22 to be an employment barrier. At the end of FY22, GSA had 231 employees with Schedule A(u) appointment codes. Of those, 44 Schedule A(u) hires had been employed by GSA for between 2.2 years and 37.3 years, but had not yet been converted to the competitive service. Overall, eligible Schedule A(u) employees who remained in the excepted service beyond 2.2 years (at the end of FY22) have been employed by the GSA for an average of eight years. Performance was not a factor relating to non-conversions, as ratings were assessed in FY21, when all non-converted Schedule A(u) employees were found to have received satisfactory (or better) performance ratings. An additional 49 Schedule A(u) employees will be at least two years past their respective latest appointment dates at the end of FY23. Barrier elimination plans center on FY23 efforts by the OHRM (1) to confirm that identified employees meet the requirements to be

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converted to the competitive service, (2) to systematically convert eligible employees (beginning with those most recently appointed), and (3) to implement reminders to notify managers so that timely conversions are more likely to occur.

- b. A second barrier was identified in FY22 that relates to employees being retained in temporary status. During the analysis to determine if eligible Schedule A(u) employees were being retained in the excepted service or being timely converted to the competitive service, it was discovered that many Schedule A(u) employees (and other employees, including PWD and PWTD) are categorized as being in temporary status, despite having appointment dates going back as far as 2008. As temporary appointments are generally limited to shorter durations (barring authorized OPM exceptions), this was identified as a potential data accuracy deficiency. As temporary employees are not afforded the same opportunities as career civil service employees, this was also identified as a potential barrier. Further analysis determined the issue to be both a deficiency and a barrier, and subsequent analysis found that the condition disproportionately affects PWD and PWTD.

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Answer: Many factors impacted execution of planned barrier elimination activities. Evolving requirements associated with COVID-19 (e.g., return to work and vaccinations) significantly impacted overall OHRM priorities and workloads, as did emphasis on DEIA initiatives. Reasonable accommodations were particularly impacted by COVID, with employee requests related to telework and/or vaccination exemptions creating an unprecedented volume of requests. Although additional OHRM staff were hired to address key functions, such as MD-715, DEIA, Selective Placement, reasonable accommodations, DVAAP, FEORP, and Special Emphasis Programs, workloads often exceeded available resources. In some cases (e.g., Schedule A(u) appointments and Special Emphasis Programs), OHRM determined that policies and/or procedures have to be developed before practices can be implemented. In other cases (e.g., targeted recruitment of PWD and PWTD), budget limitations impacted outcomes. Some issues that impacted obligations under the Affirmative Action Plan for PWD (i.e., recruitment, hiring, advancement, and retention of PWD and PWTD) were negatively impacted by multiple issues (e.g., staffing, contracting issues, and leadership priorities). For example, a combination of those factors prevented GSA from updating its exit survey to collect data on how it can improve recruitment, hiring, advancement, inclusion, and retention of PWD and PWTD. Lastly,

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some issues were impacted by the desire to first develop and provide relevant training, before implementing new practices (e.g., before communicating GSA's new PWD and PWTD participation goals to hiring managers and recruiters).

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s)

Answer: Of 3 planned activities relating to Affirmative Action Plan for PWD, only 1 was completed (establishment of agency goals for PWD and PWTD participation); however, the remaining 2 planned activities have been deferred until the end of FY23. While agency participation goals were conceptually approved in August 2022, they have not been communicated to hiring managers, recruiters, supervisors, managers, or employees. That planned activity was added to Part H plan H.14 in FY23 to ensure it is tracked through to completion. None of the 3 planned barrier elimination activities designed to resolve untimely processing of requests for reasonable accommodations were completed as reported, and all were also deferred until the end of FY23. Plans to address the addition of mandatory questions to the GSA exit survey were previously delayed in FY21 to the end of FY23.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Answer: Not applicable. All planned barrier elimination activities are future events. No planned corrective actions have yet to be implemented.



The Administrator

August 19, 2022

MEMORANDUM FOR ALL GSA EMPLOYEES

FROM: ROBIN CARNAHAN
Administrator

A handwritten signature in blue ink that reads "Robin Carnahan".

SUBJECT: GSA Equal Employment Opportunity Policy Statement

GSA strives to attract, develop, and retain the best employees from across the nation and provide an inclusive environment in which all are able to contribute to their full potential. Providing equal employment opportunity (EEO) for all is critical to that effort.

We are committed to ensuring all GSA employees and applicants for GSA employment have the freedom to compete on a fair and level playing field, free from discrimination or harassment based on any protected basis.

GSA's policy is to afford employees and applicants for employment equal opportunities, regardless of their race, color, religion, sex, pregnancy, gender identity, sexual orientation, national origin, age, disability, or genetic information (including family medical history). These EEO protections pertain to all GSA personnel and employment programs, as well as management practices and decisions, including recruitment, hiring, promotions, transfers, reassignments, training, and career development, benefits, and separations.

Additionally, reprisal against anyone who engages in protected EEO activity (e.g., reporting discrimination or harassment, participating in the EEO process, or exercising any rights provided by the civil rights statutes) will not be tolerated at GSA. Moreover, GSA supports employees in exercising their rights under the civil rights statutes.

Workplace harassment will not be tolerated. At GSA, we are committed to correcting harassing conduct before it becomes severe or pervasive. Employees found to have unlawfully discriminated against or harassed another as defined by law may be subject to corrective action up to and including removal.

Employees or applicants who believe they have been unlawfully discriminated against and wish to initiate an EEO complaint may contact GSA's Office of Civil Rights (OCR) at eeo@gsa.gov or 202-501-4571. Additional information is available on [GSA InSite](#).

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Employees who believe they have been subject to, or have been a witness to, harassment must report the matter to their first line supervisor, another management official in their supervisory chain, or an [Anti-Harassment Coordinator](#). See [GSA Order HRM 9700.6 CHGE 2](#) for more information.

Ensuring equality of employment opportunity is not only a legal requirement, but it is also foundational to achieving administration and agency diversity, equity, inclusion, and accessibility (DEIA) goals and to making GSA an employer of choice. Please join me in demonstrating commitment to integrating EEO and DEIA principles into all we do.

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Acronyms

2F	Two or More Races Female
2M	Two or More Races Male
AAP	Affirmative Action Plan
ABA	Architectural Barriers Act
ADR	Alternative Dispute Resolution
AEP	Affirmative Employment Program
AEPM	Affirmative Employment Program Manager
AF	Asian Female
AFD	Applicant Flow Data
AIAN	American Indian or Alaska Native
AH	Anti-Harassment
AHC	Anti-Harassment Coordinator
AM	Asian Male
ANSI	American National Standards Institute
ASL	American Sign Language
AYM	OPM Code for direct hire authority under 5 U.S.C. § 337.201
BF	Black or African American Female
BIG	Blacks in Government
BM	Black or African American Male
CA	Contract Appeals Pay Plan Code
CART	Communication Access Realtime Translation
CDP	Competitive Development Program
CHCO	Chief Human Capital Officer
C.F.R.	Code of Federal Regulations
CLF	Civilian Labor Force
COVID-19	Coronavirus Disease of 2019
D&I	Diversity and Inclusion
DEIA	Diversity, Equity, Inclusion, and Accessibility
DVAAP	Disabled Veterans Affirmative Action Program
ECQ	Executive Core Qualifications
EELP	Enterprise Emerging Leaders Program
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
ES	Senior Executive Service Pay Plan Code
EX	Executive Schedule Pay Plan Code
FAS	Federal Acquisition Service

FEDSEP Federal Sector EEO Portal
 FEI Federal Executive Institute
 FEMA Federal Emergency Management Agency
 FEORP Federal Equal Opportunity Recruitment Program
 FEVS Federal Employee Viewpoint Survey
 FEW Federally Employed Women
 FIPS Federal Information Processing Standard
 FWP Federal Women’s Program [See WSEP]
 FY Fiscal Year
 GAO Government Accountability Office
 GS General Schedule Pay Plan Code
 GSA U.S. General Services Administration
 HBCU Historically Black Colleges and Universities
 HEP Hispanic Employment Program (SEP)
 HF Hispanic or Latino Female
 HM Hispanic or Latino Male
 HR Human Resources
 HRM Human Resources Manual
 ICTAP Interagency Career Transition Assistance Plan
 IDEA Inclusion, Diversity, Equity, and Accessibility [Champions Program]
 IDP Individual Development Program
 IF American Indian or Alaska Native (AIAN) Female
 IM American Indian or Alaska Native (AIAN) Male
 IR Inclusion Rate
 IT Information Technology
 LGBTQ+ Lesbian, Gay, Bisexual, Transsexual, Queer/Questioning, and Others
 LRAC Local Reasonable Accommodations Coordinator
 MCO Mission-Critical Occupation
 MD-715 Management Directive 715
 MSPB Merit Systems Protection Board
 NASA National Aeronautics and Space Administration
 NAVWAR Naval Information Warfare Systems Command
 NCLF National Civilian Labor Force
 NF Native Hawaiian or Other Pacific Islander (NHOPI) Female
 NHOPI Native Hawaiian or Other Pacific Islander
 NM Native Hawaiian or Other Pacific Islander (NHOPI) Male
 NOAC Nature of Action Code

No FEAR ActNotification and Federal Employee Antidiscrimination and Retaliation Act
 OCHCOOffice of the Chief Human Capital Officer
 OCLFOccupational Civilian Labor Force
 OCR..... Office of Civil Rights
 OHRM.....Office of Human Resources Management
 OIGOffice of Inspector General
 OMB Office of Management and Budget
 OPM Office of Personnel Management
 PAS Personal Assistance Services
 PBSPublic Building Service
 PIIPersonally Identifiable Information
 PTSD..... Post-Traumatic Stress Disorder
 PWDPersons with Disabilities
 PWDP.....Persons with Disabilities Program (SEP)
 PWoDPersons without Disabilities
 PWTB.....Persons with Targeted Disabilities
 QSI Quality Step Increase
 RAReasonable Accommodation
 SEP Special Emphasis Program
 SEPM Special Emphasis Program Manager
 SES Senior Executive Service
 SF Standard Form
 SLSenior Level Pay Plan Code
 SME.....Subject Matter Expert
 SPP Selective Placement Program
 SPPC.....Selective Placement Program Coordinator
 STEM..... Scientific, Technical, Engineering, and Mathematics
 U.S.C. United States Code
 VA..... [U.S. Department of] Veterans Affairs
 VEOA..... Veterans Employment Opportunity Act of 1998
 VPCVeterans Preference Code
 VRAVeterans' Recruitment Appointment
 WG Wage Grade Pay Plan Code
 WL Wage Leader Pay Plan Code
 WRP Workforce Recruitment Program
 WS..... Wage Supervisor Pay Plan Code
 WSEP Women's Special Emphasis Program